POWELL, GOLDSTEIN, FRAZER & MURPHY

ATTORNEYS AT LAW

Sixteenth Floor 191 Peachtree Street, N.E. Atlanta, Georgia 30303 404 572-6800 Facsimile 404 572-6999

PLEASE RESPOND: Washington Address

LA O H 35 BANA

1001 Pannsylvania Avenue, N.W. Washington, D.C. 20004 202 347-0066

Facsimile 202 624-7222

(202) 624-7235

March 8, 1996

MUR 4322

Mr. Lawrence M. Noble General Counsel Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

Dear Mr. Noble:

On behalf of Enid Greene Waldholtz as Treasurer of Enid '94 and Enid '96 and as counsel to both Committees, enclosed please find three (3) copies of a complaint against the Committees' former Treasurer, Joseph P. Waldholtz, alleging that he committed over 850 violations of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431, et seq., and applicable Federal Election Commission regulations during his tenure as Treasurer of Enid '94 and Enid '96.

We will be glad to provide you with any additional information you may require in order to pursue this matter and resolve it as expeditiously as possible.

Sincerely,

Michael H. Chanin

For POWELL, GOLDSTEIN, FRAZER & MURPHY Counsel to Enid '94, Enid '96, and Enid Greene Waldholtz as Treasurer of Enid '94 and Enid '96

Enclosures

FEDERAL ELECTION COMMISSION

Enid Greene Waldholtz Treasurer, Enid '94 & Enid '96 1671 34th Street, N.W. Washington, D.C. 20007

and

Enid '94 P.O. Box 11232 Salt Lake City, UT 84147-0232

and

Enid '96 P.O. Box 11232 Salt Lake City, UT 84147-0232

Complainants,

v.

Joseph P. Waldholtz c/o Harvey A. Sernovitz, Esq. The Curtis Center Suite L44 Sixth & Walnut Streets, Philadelphia, PA 19106

Respondent.

MUR 4322

COMPLAINT

Enid Greene Waldholtz, Treasurer of Enid '94 and Enid '96, by counsel, having reason to believe that Joseph P. Waldholtz has committed multiple violations of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431, et seq., and applicable Federal Election Commission regulations, states as follows:

INTRODUCTION

- 1. On November 11, 1995, Joseph P. Waldholtz, the
 Treasurer of Enid '94 and Enid '96, fled Washington, D.C. while
 under investigation by the U.S. Attorney's Office for the
 District of Columbia and the Federal Bureau of Investigation.
 During a search of the papers he left behind, Complainant Enid
 Greene Waldholtz discovered records which led her to believe that
 Joseph P. Waldholtz had misappropriated a substantial amount of
 money from the campaign accounts of both committees.
- 2. Complainant Enid Greene Waldholtz immediately removed Joseph P. Waldholtz from his positions as Treasurer of Enid '94 and Enid '96 and, shortly thereafter, retained the national accounting firm of Coopers & Lybrand, L.L.P. to use forensic accounting procedures to reconstruct the campaign records of both committees. The reconstructed records show that, during the period he served as Treasurer of Enid '94 and Enid '96, Joseph P. Waldholtz committed multiple violations of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431, et seq., and applicable Federal Election Commission regulations. Statements of factual matters made herein "on information and belief" are based upon the records reconstructed by Coopers & Lybrand.
- 3. On information and belief, during the time that he served as Treasurer of Enid '94 and Enid '96, Joseph P. Waldholtz, using funds he had obtained by fraud and under false pretenses from Enid Greene Waldholtz's father, D. Forrest Greene, knowingly and willfully made eighty (80) contributions totaling

at least one million, eight hundred twenty-one thousand, five hundred forty-three dollars and two cents (\$1,821,543.02) to Enid '94 and Enid '96. D. Forrest Greene was unaware that funds he had loaned to Joseph P. Waldholtz were being transferred into the Enid '94 and Enid '96 campaign accounts. Enid Greene Waldholtz was initially unaware that funds loaned by her father to Joseph P. Waldholtz were being transferred to the Enid '94 and Enid '96 campaign accounts and later believed, due to the misrepresentations of Joseph P. Waldholtz regarding her interest in a piece of property in Pennsylvania, that she had a legal right to transfer certain funds to her campaign accounts. one of the eighty (80) contributions made by Joseph P. Waldholtz exceeded the one thousand dollar (\$1,000.00) per election maximum contribution allowed by law, in violation of 2 U.S.C. § 441a(a)(1)(A) and 11 C.F.R. § 110.1(b)(1). These allegations are more specifically set forth in Paragraphs 26, 27 and 28.

4. On information and belief, Joseph P. Waldholtz concealed these illegal contributions in several ways. On information and belief, on twenty-eight (28) occasions, Joseph P. Waldholtz knowingly and willfully attributed the contributions to Enid Greene Waldholtz, in violation of the prohibition against making contributions in the name of another. 2 U.S.C. § 441f and 11 C.F.R. § 110.4(b). Joseph P. Waldholtz contributed a total of at least nine hundred eighty-four thousand dollars (\$984,000.00) to Enid '94 in the name of Enid Greene Waldholtz. (See Exhibit 1, which is incorporated herein by reference). These allegations

are more specifically set forth in Paragraphs 26(a), 29, 31 and 32.

- 5. On information and belief, Joseph P. Waldholtz also sought to conceal his illegal contributions to Enid '94 and Enid '96 by not reporting them, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. §§ 104.3(a)(4)(i) and 104.14(d). On information and belief, Joseph P. Waldholtz knowingly and willfully contributed, but failed to disclose, a total of at least eight hundred nineteen thousand, two hundred eighteen dollars and two cents (\$819,218.02) to Enid '94 and Enid '96 using funds he obtained from D. Forrest Greene by fraud and under false pretenses. (See Exhibit 2, which is incorporated herein by reference). These allegations are more specifically set forth in Paragraphs 26(b), 30, and 33 through 39.
- 6. On information and belief, Joseph P. Waldholtz also sought to conceal his illegal contributions to Enid '94 and Enid '96 by making several large contributions in the form of cash, in violation of 2 U.S.C. § 441g and 11 C.F.R. § 110.4(c). On information and belief, Joseph P. Waldholtz knowingly and willfully contributed a total of eighteen thousand, three hundred and twenty-five dollars (\$18,325.00) to Enid '94 and Enid '96 in the form of cash. (See Exhibit 3, which is incorporated herein by reference). These allegations are more specifically set forth in Paragraphs 26(c) and 40.
- 7. On information and belief, at the same time that he was illegally channeling funds belonging to D. Forrest Greene into

the Enid '94 and Enid '96 committees, Joseph P. Waldholtz was also embezzling a substantial amount of money from both committees. On information and belief, Joseph P. Waldholtz knowingly and willfully commingled at least ninety-one thousand, nine hundred fifty-seven dollars and fifty-two cents (\$91,957.52) in committee funds with his own personal funds, or those of his relatives, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. On information and belief, Joseph P. Waldholtz was able to conceal this extensive misappropriation of committee funds by knowingly and willfully failing to report the disbursements, in violation of 2 U.S.C. § 434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d). These allegations are more specifically set forth in Paragraphs 44 through 55.

8. On information and belief, Joseph P. Waldholtz used a variety of methods to siphon illegally the above-mentioned ninety-one thousand, nine hundred fifty-seven dollars and fifty-two cents (\$91,957.52) out of Enid '94 and Enid '96 -- most commonly by transferring funds directly out of campaign accounts and into personal accounts under his control or in the name of his relatives. On information and belief, Joseph P. Waldholtz knowingly and willfully transferred a total of at least sixty-three thousand, three hundred seventy-four dollars and fifty-two cents (\$63,374.52) from campaign accounts to such personal accounts. (See Exhibit 4, which is incorporated herein by reference). These allegations are more specifically set forth in Paragraphs 44 through 48.

- 9. On information and belief, Joseph P. Waldholtz also siphoned Enid '94 funds by embezzling campaign contributions by depositing checks delivered to him into his own personal checking account. On information and belief, on four separate occasions during December of 1993, Joseph P. Waldholtz knowingly and willfully deposited into his own personal checking account a total of thirty-six (36) campaign contribution checks, made payable to the Send Enid Greene to Congress Committee (the original name of Enid '94) or equivalent. A total of two thousand, eight hundred and eighty-three dollars (\$2,883.00) intended for the Enid '94 Committee was deposited in this way in his personal checking account. (See Exhibit 5, which is incorporated herein by reference). These allegations are more specifically set forth in Paragraph 49.
- 10. On information and belief, another method by which Joseph P. Waldholtz siphoned Enid '94 and Enid '96 funds was to use checks made out to "Cash" to withdraw money from campaign accounts. On information and belief, Joseph P. Waldholtz knowingly and willfully withdrew at least six thousand, two hundred dollars (\$6,200.00) in cash from the Enid '94 and Enid '96 committee accounts. (See Exhibit 6, which is incorporated herein by reference). These allegations are more specifically set forth in Paragraphs 50 and 51.
- 11. On information and belief, Joseph P. Waldholtz also siphoned funds from the Enid '94 account by making checks out to himself and then either cashing the checks or depositing them

into his personal checking accounts. On information and belief, Joseph P. Waldholtz knowingly and willfully withdrew a total of at least five thousand, five hundred dollars (\$5,500.00) from the Enid '94 and Enid '96 accounts in this manner. (See Exhibit 7, which is incorporated herein by reference). These allegations are more specifically set forth in Paragraph 52.

- 12. On information and belief, on at least three (3) occasions, Joseph P. Waldholtz siphoned funds out of the Enid '94 and Enid '96 accounts by writing checks to Enid Greene Waldholtz and then depositing the checks, without Enid Greene Waldholtz's knowledge or endorsement, into one of their joint personal checking accounts. On information and belief, Joseph P. Waldholtz knowingly and willfully withdrew a total of at least eight thousand dollars (\$8,000.00) from campaign accounts in this way. (See Exhibit 8, which is incorporated herein by reference). These allegations are more specifically set forth in Paragraph 53.
- 13. On two (2) occasions Joseph P. Waldholtz used campaign funds to pay personal credit card bills. On information and belief, Joseph P. Waldholtz knowingly and willfully siphoned a total of at least six thousand dollars (\$6,000.00) from campaign accounts in order to pay personal VISA card debt. (See Exhibit 9, which is incorporated herein by reference). These allegations are more specifically set forth in Paragraphs 54 and 55.
- 14. In addition, on information and belief, Joseph P. Waldholtz attempted to conceal the scope of his illegal

activities by knowingly and willfully (1) over-reporting or under-reporting the amounts he contributed in the name of Enid Greene Waldholtz, (2) reporting contributions from individuals who either did not exist or did not contribute, and (3) by failing to report contributions from individuals who did contribute, all in violation of 2 U.S.C. § 434(b) and 11 C.F.R. §§ 104.3(b) and 104.14(d). These allegations are more specifically set forth in Paragraphs 56 through 60.

BACKGROUND INFORMATION

- 15. On December 1, 1993, Joseph P. Waldholtz established a campaign checking account (number 077-00008-00) (hereinafter the "Enid '94 Account") at First Security Bank in Salt Lake City, Utah. The Enid '94 Account was set up so that checks could be drawn on the account with only one signature. Joseph P. Waldholtz listed himself as the only person authorized to write checks on the Enid '94 Account. (See Exhibit 10, which is incorporated herein by reference).
- established a second campaign checking account (number 051-00060-75) (hereinafter the "Enid '94-2 Account") at First Security Bank in Salt Lake City, Utah. The Enid '94-2 Account was set up so that checks could be drawn on the account with only one signature. Joseph P. Waldholtz listed himself and R. Aaron Edens as the only persons authorized to write checks on the Enid '94-2 Account. (See Exhibit 11, which is incorporated herein by reference).

- 17. On December 21, 1993, pursuant to 2 U.S.C. § 432(e)(1), Enid Greene Waldholtz designated Enid '94 as her principal campaign committee for the 1994 election. (See Exhibit 12, which is incorporated herein by reference). Joseph P. Waldholtz filed a Statement of Organization for Enid '94 with the Clerk of the House of Representatives, listing himself as Treasurer and Custodian of Records and Kaylin Loveland as Assistant Treasurer. (See Exhibit 13, which is incorporated herein by reference).
- 18. Pursuant to 2 U.S.C. §§ 432 through 434, Joseph P. Waldholtz, as Treasurer of Enid '94, was responsible for selecting a campaign depository and establishing all campaign accounts, accepting all contributions, depositing all contributions into the campaign accounts, making all disbursements from the campaign accounts, and for maintaining complete and accurate records of all contributions and disbursements. In addition, Joseph P. Waldholtz was responsible for the preparation, signing, and filing of the complete and accurate reports of receipts and disbursements required by 2 U.S.C. § 434.
- 19. As Treasurer of Enid '94, Joseph P. Waldholtz was responsible for supervising the Assistant Treasurer, Kaylin Loveland. On information and belief, Joseph P. Waldholtz and/or Kaylin Loveland prepared the January 31 Year-End Report for Enid '94, covering the period July 1, 1993 through December 31, 1993. Kaylin Loveland signed the Year-End Report for Enid '94; it was dated January 31, 1994 and filed with the Clerk of the House of

Representatives. (See Exhibit 14, which is incorporated herein by reference).

- 20. On information and belief, Joseph P. Waldholtz and/or Kaylin Loveland prepared and Kaylin Loveland, in her capacity as Assistant Treasurer, signed the April 15 Quarterly Report for Enid '94, covering the period January 1, 1994 through March 31, 1994, and dated April 15, 1994. It was filed with the Clerk of the House of Representatives. (See Exhibit 15, which is incorporated herein by reference).
- 21. On information and belief, thereafter, Joseph P. Waldholtz, as Treasurer of Enid '94, prepared or directed the preparation of, signed, and filed or caused to be filed with the Clerk of the House of Representatives, the following nine (9) reports:
- (a) The Twelfth Day Report preceding the Utah Republican Convention, covering the period April 1, 1994 through April 17, 1994, dated April 21, 1994. (See Exhibit 16, which is incorporated herein by reference).
- (b) The July 15 Quarterly Report, covering the period April 18, 1994 through June 30, 1994, dated July 15, 1994. (See Exhibit 17, which is incorporated herein by reference).
- (c) An Amendment to the July 15 Quarterly Report, dated October 13, 1994. (See Exhibit 18, which is incorporated herein by reference).
- (d) The October 15 Quarterly Report, covering the period July 1, 1994 through September 30, 1994, dated October 13,

1994. (See Exhibit 19, which is incorporated herein by reference).

- (e) The Twelfth Day Report preceding the General Election held in Utah on November 8, 1994, covering the period October 1, 1994 through October 19, 1994, dated October 23, 1994. (See Exhibit 20, which incorporated herein by reference).
- (f) An Amendment to the October 15 Quarterly Report, dated October 23, 1994. (See Exhibit 21, which is incorporated herein by reference).
- (g) The Thirtieth Day Report following the General Election held in Utah on November 8, 1994, covering the period October 20, 1994 through November 28, 1994, dated December 8, 1994. (See Exhibit 22, which is incorporated herein by reference).
- (h) The January 31 Year-End Report, covering the period November 29, 1994 through December 31, 1994, dated January 31, 1995. (See Exhibit 23, which is incorporated herein by reference).
- (i) The July 31 Mid-Year Report, covering the period January 1, 1995 through June 30, 1995, dated July 31, 1995. (See Exhibit 24, which is incorporated herein by reference).
- 22. On February 9, 1995, Joseph P. Waldholtz established a campaign checking account in the name of Enid '96 (number 051-0080-30) (hereinafter the "Enid '96 Account") at First Security Bank in Salt Lake City, Utah. The Enid '96 Account was set up so that checks could be drawn on the account with only one

signature. Joseph P. Waldholtz listed himself and R. Aaron Edens as the only persons authorized to write checks on the Enid '96 Account. On August 16, 1995, two other campaign workers, David A. Nielsen and J. Greg Engeman, were added to the list of persons authorized to write checks on the Enid '96 Account. (See Exhibit 25, which is incorporated herein by reference).

- 23. On July 31, 1995, Joseph P. Waldholtz filed a Statement of Organization with the Clerk of the House of Representatives establishing Enid '96 as Representative Enid Greene Waldholtz's principal campaign committee for the 1996 election. Joseph P. Waldholtz listed himself as the Treasurer of Enid '96. (See Exhibit 26, which is incorporated herein by reference).
- 24. Pursuant to 2 U.S.C. §§ 432 through 434, Joseph P. Waldholtz, as Treasurer of Enid '96, was responsible for selecting a campaign depository and establishing all campaign accounts, accepting all contributions, depositing all contributions into the campaign accounts, making all disbursements from the campaign accounts, and for maintaining complete and accurate records of all contributions and disbursements. In addition, Joseph P. Waldholtz was responsible for the preparation, signing, and filing of the complete and accurate reports of receipts and disbursements required by 2 U.S.C. § 434.
- 25. Joseph P. Waldholtz, as Treasurer of Enid '96, prepared or directed the preparation of, signed, and filed or caused to be filed with the Clerk of the House of Representatives the Enid '96

July 31 Mid-Year Report, covering the period January 1, 1995 through June 30, 1995, dated July 31, 1995. (See Exhibit 27, which is incorporated herein by reference).

CONTRIBUTIONS IN EXCESS OF STATUTORY LIMITS

A. SUMMARY OF THESE ILLEGAL CONTRIBUTIONS

- On information and belief, during the time he served as Treasurer of Enid '94 and Enid '96, Joseph P. Waldholtz, using funds he had obtained by fraud and under false pretenses from Enid Greene Waldholtz's father, D. Forrest Greene, knowingly and willfully made a series of eighty (80) contributions, totaling one million, eight hundred twenty-one thousand, five hundred and forty-three dollars and two cents (\$1,821,543.02) to Enid '94 and Enid '96, in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431, et seq., and applicable Federal Election Commission regulations. D. Forrest Greene Was unaware that funds he had loaned to Joseph P. Waldholtz were being transferred into the Enid '94 and Enid '96 campaign Enid Greene Waldholtz was initially unaware that funds accounts. loaned by her father to Joseph P. Waldholtz were being transferred to the Enid '94 and Enid '96 campaign accounts and later believed, due to the misrepresentations of Joseph P. Waldholtz regarding her interest in a piece of property in Pennsylvania, that she had a legal right to transfer certain funds to her campaign accounts.
- (a) Joseph P. Waldholtz reported only twenty-eight (28) of the eighty (80) actual contributions -- but, on

information and belief, when he did so, he knowingly and willfully reported them as contributions by Enid Greene Waldholtz to Enid '94, in violation of 2 U.S.C. § 441f and 11 C.F.R.

110.4(b):

	DATE	THUOMA	FROM ACCOUNT	TO ACCOUNT	REPORTED TO FEC
1.	07/08/94	\$10,000.00			\$10,000.00
2.	07/15/94	\$3,000.00			\$3,000.00
3.	07/17/94	\$3,000.00			\$3,000.00
4.	07/22/94	\$10,000.00			\$10,000.00
5.	08/08/94	\$10,000.00			\$10,000.00
6.	08/12/94	\$5,000.00			\$5,000.00
7.	08/23/94	\$2,000.00			\$2,000.00
8.	08/23/94	\$1,000.00			\$1,000.00
9.	08/23/94	\$1,000.00			\$1,000.00
10.	08/24/94	\$1,000.00			\$1,000.00
11.	08/24/94	\$500.00			\$500.00
12.	08/26/94	\$15,000.00			\$15,000.00
13.	08/29/94	\$2,000.00			\$2,000.00
14.	09/02/94	\$50,000.00			\$50,000.00
15.	09/02/94	\$10,000.00			\$10,000.00
16.	09/07/94	\$10,000.00			\$10,000.00
17.	09/08/94	\$3,000.00			\$3,000.00
18.	09/09/94	\$5,000.00			\$5,000.00
19.	09/13/94	\$100,000.00			\$10,000.00
20.	09/16/94	\$10,000.00			\$10,000.00
21.	09/19/94	\$25,000.00			\$25,000.00
22.	09/20/94	\$200,000.00			\$400,000.00
23.	09/21/94	\$2,500.00			\$2,500.00
24.	09/22/94	\$20,000.00			\$20,000.00
25.	09/29/94	\$25,000.00			\$25,000.00
26.	10/18/94	\$250,000.00			\$250,000.00

	DATE	AMOUNT	FROM ACCOUNT	TO ACCOUNT	REPORTED TO FEC
27.	11/08/94	\$60,000.00			\$69,000.00
28.	11/14/94	\$150,000.00			\$200,000.00
	TOTAL:	\$984,000.00			

(See also Exhibit 1).

On information and belief, during the time he served as Treasurer of Enid '94 and Enid '96, Joseph P. Waldholtz knowingly and willfully made a total of forty-one (41) contributions to Enid '94 and Enid '96 by transferring funds directly from personal checking accounts under his control to Enid '94 and Enid '96 campaign accounts. None of these forty-one (41) contributions were reported to the Federal Election Commission, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R.

§§ 104.3(a)(4)(i) and 104.14(d):

	DATE	AMOUNT	FROM ACCOUNT	TO ACCOUNT	<u>reported</u> <u>To fec</u>
1.	02/08/94	\$3,900.00			\$0.00
2.	02/23/94	\$1,000.00			\$0.00
3.	03/01/94	\$5,000.00			\$0.00
4.	05/09/94	\$400.00			\$0.00
5.	05/10/94	\$600.00			\$0.00
6.	05/16/94	\$2,500.00			\$0.00
7.	05/17/94	\$4,000.00			\$0.00
8.	06/08/94	\$2,000.00			\$0.00
9.	06/23/94	\$11,000.00			\$0.00
10.	06/27/94	\$2,513.10			\$0.00
11.	10/12/94	\$2,500.00			\$0.00
12.	10/21/94	\$200,000.00			\$0.00
13.	10/27/94	\$37,000.00			\$0.00

	DATE	AMOUNT	FROM ACCOUNT	TO ACCOUNT	REPORTED TO FEC
14.	10/27/94	\$3,000.00			\$0.00
15.	10/28/94	\$250,000.00			\$0.00
16.	11/03/94	\$25,000.00			\$0.00
17.	11/03/94	\$20,000.00			\$0.00
18.	11/04/94	\$15,000.00			\$0.00
19.	01/09/95	\$100,000.00			\$0.00
20.	02/23/95	\$30,871.16			\$0.00
21.	02/23/95	\$20,000.00			\$0.00
22.	02/23/95	\$13,591.76			\$0.00
23.	04/11/95	\$5,000.00			\$0.00
24.	07/05/95	\$900.00			\$0.00
25.	07/06/95	\$2,500.00			\$0.00
26.	08/14/95	\$2,000.00			\$0.00
27.	08/15/95	\$11,000.00			\$0.00
28.	08/16/95	\$5,929.00			\$0.00
29.	08/18/95	\$5,000.00			\$0.00
30.	08/18/95	\$5,000.00			\$0.00
31.	08/18/95	\$12,811.35			\$0.00
32.	09/07/95	\$650.00			\$0.00
33.	09/11/95	\$1,000.00			\$0.00
34.	09/22/95	\$390.88			\$0.00
35.	09/26/95	\$130.00			\$0.00
36.	10/03/95	\$200.00			\$0.00
37.	10/06/95	\$630.77			\$0.00
38.	10/12/95	\$10,000.00			\$0.00
39.	10/24/95	\$5,000.00			\$0.00
40.	11/02/95	\$500.00			\$0.00
41.	11/06/95	\$700.00			\$0.00
	TOTAL:	\$819,218.02			

(See also Exhibit 2).

(c) Finally, on information and belief, during the time he was Treasurer of Enid '94 and Enid '96, Joseph P. Waldholtz knowingly and willfully made a series of eleven (11) cash contributions to Enid '94 and Enid '96, in violation of 2 U.S.C. § 441g and 11 C.F.R. § 110.4(c):

	<u>DATE</u>	AMOUNT	TO ACCOUNT	REPORTED TO FEC
1.	03/02/94	\$1,000.00		\$0.00
2.	03/03/94	\$1,500.00		\$0.00
3.	03/08/94	\$2,000.00		\$0.00
4.	03/09/94	\$2,500.00		\$0.00
5.	04/18/94	\$500.00		\$0.00
6.	04/25/94	\$5,000.00		\$0.00
7.	05/27/94	\$3,000.00		\$0.00
8.	07/01/94	\$125.00		\$0.00
9.	08/31/94	\$100.00		\$0.00
10.	09/07/94	\$100.00		\$0.00
11.	08/08/95	\$2,500.00		\$0.00
	TOTAL:	\$18,325.00		

(See also Exhibit 3).

B. YEAR-BY-YEAR ANALYSIS OF ILLEGAL CONTRIBUTIONS

1. Contributions to Enid '94 in 1994

27. On information and belief, on forty-six (46) separate occasions during 1994, Joseph P. Waldholtz, using funds he had obtained by fraud and under false pretenses from Enid Greene Waldholtz's father, D. Forrest Greene, knowingly and willfully made contributions totaling one million, five hundred sixty-nine thousand, four hundred thirteen dollars and ten cents

(\$1,569,413.10) to Enid '94. (See Exhibit 28, which is incorporated herein by reference). D. Forrest Greene was unaware that funds he had loaned to Joseph P. Waldholtz were being transferred into the Enid '94 campaign accounts. Enid Greene Waldholtz was initially unaware that funds loaned by her father to Joseph P. Waldholtz were being transferred to the Enid '94 campaign accounts and later believed, due to the misrepresentations of Joseph P. Waldholtz regarding her interest in a piece of property in Pennsylvania, that she had a legal right to transfer certain funds to her campaign accounts. Each one of the contributions made by Joseph P. Waldholtz to Enid '94 in 1994 exceeded the one thousand dollar (\$1,000.00) per election maximum contribution allowed by law, in violation of 2 U.S.C. § 441a(a)(1)(A) and 11 C.F.R. § 110.1(b)(1).

- 28. Joseph P. Waldholtz's one million, five hundred sixtynine thousand, four hundred thirteen dollars (\$1,569,413.10) in contributions to Enid '94 in 1994 also far exceeded the twenty-five thousand dollar (\$25,000.00) aggregate cap on political contributions an individual can give in any one year, in violation of 2 U.S.C. § 441a(a)(3) and 11 C.F.R. § 110.5.
- 29. On information and belief, on the October 15 Quarterly Report, the Amendment to the October 15 Quarterly Report, the Twelfth Day Report preceding the General Election, and the Thirtieth Day Report following the General Election, Joseph P. Waldholtz reported twenty-eight (28) of the forty-six (46) contributions (see Exhibits 19, 20, 21 and 22), but he knowingly

and willfully attributed these contributions to Enid Greene Waldholtz, in violation of 2 U.S.C. § 441f and 11 C.F.R. 110.4(b). (See Exhibit 1).

- 30. On information and belief, Joseph P. Waldholtz knowingly and willfully failed to report the remaining eighteen (18) contributions, totalling five hundred eighty-five thousand, four hundred thirteen dollars and ten cents (\$585,413.10) that he made to Enid '94 between February 8, 1994 and November 4, 1994, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. §§ 104.3(a)(4)(i) and 104.14(d). (See Exhibits 15, 17, 18, 20, 22 and 29, which are incorporated herein by reference).
- 31. On information and belief, Joseph P. Waldholtz knowingly and willfully reported incorrectly four (4) of the twenty-eight (28) contributions he falsely claimed had been made by Enid Greene Waldholtz, both overstating and understating the actual amounts he contributed to Enid '94, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. §§ 104.3(a)(4)(i) and 104.14(d):
- (a) On the October 15 Quarterly Report, Joseph P. Waldholtz reported that Enid Greene Waldholtz made a ten thousand dollar (\$10,000.00) contribution to Enid '94 on September 13, 1994.

 (See Exhibit 19). In fact, on September 13, 1994, Joseph P. Waldholtz transferred from a personal checking account (the "51 Account" as defined in paragraph 41(b) below) to the Enid '94-2 Account one hundred thousand dollars (\$100,000.00). (See Exhibit 1).

- (b) On the October 15 Quarterly Report, Joseph P. Waldholtz also reported that Enid Greene Waldholtz had made a four hundred thousand dollar (\$400,000.00) contribution to Enid '94 on September 20, 1994. (See Exhibit 19). In fact, on September 20, 1994, Joseph P. Waldholtz transferred from the 51 Account to the Enid '94-2 Account two hundred thousand dollars (\$200,000.00). (See Exhibit 1).
- (c) On the Thirtieth Day Report following the General Election, Joseph P. Waldholtz reported that Enid Greene Waldholtz had made a sixty-nine thousand dollar (\$69,000.00) contribution to Enid '94 on November 8, 1994. (See Exhibit 22). In fact, on November 8, 1994, Joseph P. Waldholtz transferred from the 51 Account to the Enid '94-2 Account sixty thousand dollars (\$60,000.00). (See Exhibit 1).
- (d) On the Thirtieth Day Report following the General Election, Joseph P. Waldholtz also reported that Enid Greene Waldholtz had made a two hundred thousand dollar (\$200,000.00) contribution to Enid '94 on November 13, 1994. (See Exhibit 22). In fact, on November 13, 1994, Joseph P. Waldholtz transferred from the 51 Account to the Enid '94-2 Account one hundred fifty thousand dollars (\$150,000.00). (See Exhibit 1).
- 32. On information and belief, Joseph P. Waldholtz knowingly and willfully reported falsely, and attributed to Enid Greene Waldholtz, eight (8) contributions to Enid '94 which never, in fact, occurred, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. §§ 104.3(a) (4)(i) and 104.14(d):

- (a) Joseph P. Waldholtz reported on the October 15

 Quarterly Report that Enid Greene Waldholtz had made a

 contribution of three thousand dollars (\$3,000.00) to Enid '94 on

 July 1, 1994. (See Exhibit 19). In fact, a complete

 reconstruction of the Enid '94 and Enid 94-2 Accounts, prepared

 by Coopers & Lybrand using basic bank records, shows that no

 contribution in that amount was made to Enid '94 by Enid Greene

 Waldholtz on that date. (See Exhibit 1).
- (b) Joseph P. Waldholtz also reported on the October 15
 Quarterly Report that Enid Greene Waldholtz had made a
 contribution of eight thousand, five hundred and seventy-one
 dollars and seventy-three cents (\$8,571.73) to Enid '94 on July
 20, 1994. (See Exhibit 19). The Coopers & Lybrand
 reconstruction of the Enid '94 and Enid 94-2 Accounts again shows
 that no contribution in that amount was made to Enid '94 by Enid
 Greene Waldholtz on that or any other date. (See Exhibit 1).
- (c) On the October 15 Quarterly Report, Joseph P. Waldholtz also reported that Enid Greene Waldholtz had made a contribution of eleven thousand, five hundred and seventy-one dollars and forty-three cents (\$11,571.43) to Enid '94 on July 25, 1994. (See Exhibit 19). The Coopers & Lybrand reconstruction of the Enid '94 and Enid 94-2 Accounts shows that no contribution in that amount was made to Enid '94 by Enid Greene Waldholtz on that or any other date. (See Exhibit 1).
- (d) On the October 15 Quarterly Report, Joseph P. Waldholtz reported that Enid Greene Waldholtz had made a contribution of

six thousand, four hundred and thirty-one dollars and ten cents (\$6,431.10) to Enid '94 on August 8, 1994. (See Exhibit 19).

Again, the Coopers & Lybrand reconstruction of the Enid '94 and Enid 94-2 Accounts shows that no contribution in that amount was made to Enid '94 by Enid Greene Waldholtz on that or any other date. (See Exhibit 1).

- (e) On the October 15 Quarterly Report, Joseph P. Waldholtz also reported that Enid Greene Waldholtz had made a contribution of five thousand, eight hundred and six dollars and thirty-two cents (\$5,806.32) to Enid '94 on August 12, 1994. (See Exhibit 19). Again, the Coopers & Lybrand reconstruction of the Enid '94 and Enid 94-2 Accounts shows that no contribution in that amount was made to Enid '94 by Enid Greene Waldholtz on that or any other date. (See Exhibit 1).
- (f) On the October 15 Quarterly Report, Joseph P. Waldholtz also reported that Enid Greene Waldholtz had made a second contribution of five thousand, eight hundred and six dollars and thirty-two cents (\$5,806.32) to Enid '94 on August 23, 1994. (See Exhibit 19). In fact, the Coopers & Lybrand reconstruction of the Enid '94 and Enid 94-2 Accounts shows that no contribution in that amount was made to Enid '94 by Enid Greene Waldholtz on that or any other date. (See Exhibit 1).
- (g) On the October 15 Quarterly Report, Joseph P. Waldholtz reported that Enid Greene Waldholtz had made a twenty-seven thousand dollar (\$27,000.00) contribution to Enid '94 on August 26, 1994. (See Exhibit 19). The Coopers & Lybrand

reconstruction of the Enid '94 and Enid 94-2 Accounts shows that no contribution in the amount of twenty-seven thousand dollars (\$27,000.00) was made to Enid '94 by Enid Greene Waldholtz on that or any other date. (See Exhibit 1).

(h) On the Twelfth Day Report preceding the General Election, Joseph P. Waldholtz reported that Enid Greene Waldholtz had made a four hundred thousand dollar (\$400,000.00) contribution to Enid '94 on October 17, 1994. (See Exhibit 20). The Coopers & Lybrand reconstruction of the Enid '94 and Enid 94-2 Accounts shows that no contribution in that amount was made to Enid '94 by Enid Greene Waldholtz on that or any other date. (See Exhibit 1).

Contributions to Enid '94 in 1995

33. On information and belief, on seven (7) separate occasions during 1995, Joseph P. Waldholtz, using funds he had obtained by fraud and under false pretenses from Enid Greene Waldholtz's father, D. Forrest Greene, knowingly and willfully made contributions totaling one hundred sixty-seven thousand, four hundred and fifty dollars and sixteen cents (\$167,450.16) to the Enid '94-2 Account. (See Exhibit 30, which is incorporated herein by reference). D. Forrest Greene was unaware that funds he had loaned to Joseph P. Waldholtz were being transferred into the Enid '94 campaign accounts. Enid Greene Waldholtz was initially unaware that funds loaned by her father to Joseph P. Waldholtz were being transferred to the Enid '94 campaign accounts and later believed, due to the misrepresentations of

Joseph P. Waldholtz regarding her interest in a piece of property in Pennsylvania, that she had a legal right to transfer certain funds to her campaign accounts. Given that Joseph P. Waldholtz's first contribution to Enid '94 in 1995 consisted of one hundred thousand dollars (\$100,000.00), each of the seven (7) individual contributions exceeded the one thousand dollar (\$1,000.00) per election maximum contribution allowed by law, in violation of 2 U.S.C. § 441a(a)(1)(A) and 11 C.F.R. § 110.1(b)(1).

- 34. On information and belief, Joseph P. Waldholtz also knowingly and willfully failed to disclose the four (4) contributions, totaling one hundred fifty-five thousand, eight hundred seventy-one dollars and sixteen cents (\$155,871.16), he made to Enid '94 prior to June 30, 1995, on the July 31 Mid-Year Report, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. §§ 104.3(a)(4)(i) and 104.14(d). (See Exhibit 24).
- 35. Joseph P. Waldholtz's one hundred and fifty-five thousand, eight hundred seventy-one dollars and sixteen cents (\$155,871.16) in contributions to Enid '94 in 1995 also far exceeded the twenty-five thousand dollar (\$25,000.00) aggregate cap on political contributions an individual can give in any one year, in violation of 2 U.S.C. § 441a(a)(3) and 11 C.F.R. § 110.5.

3. Contributions to Enid '96 in 1995

36. On information and belief, on sixteen (16) separate occasions during 1995, Joseph P. Waldholtz, using funds he had obtained by fraud and under false pretenses from Enid Greene

Waldholtz's father, D. Forrest Greene, knowingly and willfully made contributions totaling sixty-six thousand, three hundred and fifty-four dollars and seventy-six cents (\$66,354.76) to the Enid '96 Account. (See Exhibit 31, which is incorporated herein by reference). D. Forrest Greene was unaware that funds he had loaned to Joseph P. Waldholtz were being transferred into the Enid '96 campaign accounts. Enid Greene Waldholtz was also unaware that funds loaned by her father to Joseph P. Waldholtz were being transferred to the Enid '96 campaign accounts. Given that Joseph P. Waldholtz's first contribution to Enid '96 consisted of thirteen thousand, five hundred and ninety-one dollars and seventy-six cents (\$13,591.76), each of the sixteen (16) individual contributions exceeded the one thousand dollar (\$1,000.00) per election maximum contribution allowed by law, in violation of 2 U.S.C. § 441a(a)(1)(A) and 11 C.F.R. § 110.1(b)(1).

- 37. On information and belief, Joseph P. Waldholtz also knowingly and willfully failed to disclose the thirteen thousand, five hundred and ninety-one dollar and seventy-six cent (\$13,591.76) contribution he made to Enid '96 on February 23, 1995 when he filed the July 31 Mid-Year Report, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. §§ 104.3(a)(4)(i) and 104.14(d). (See Exhibit 24).
- 38. Joseph P. Waldholtz's sixty-six thousand, three hundred and fifty-four dollars and seventy-six cents (\$66,354.76) in contributions to Enid '96 in 1995 also exceeds the twenty-five

thousand dollar (\$25,000.00) aggregate cap on political contributions an individual can give in any one year, in violation of 2 U.S.C. § 441a(a)(3) and 11 C.F.R. § 110.5.

39. On information and belief, in violation of 2 U.S.C. §
434(b)(3)(A) and 11 C.F.R. §§ 104.3(a)(4)(i) and 104.14(d),
Joseph P. Waldholtz also knowingly and willfully reported falsely
that he contributed one thousand dollars (\$1,000.00) to Enid '96
on May 1, 1995. (See Exhibit 27). In fact, a complete
reconstruction of the Enid '96 and Enid '96-2 Accounts prepared
by the national accounting firm of Coopers & Lybrand, L.L.P.,
using basic bank records, shows that no contribution in the
amount of one thousand dollars (\$1,000.00) was made to Enid '96
by Joseph P. Waldholtz on that date. (See Exhibit 31).

4. Cash Contributions

40. On information and belief, during the time he was Treasurer of Enid '94 and Enid '96, Joseph P. Waldholtz, in a series of eleven (11) transactions, knowingly and willfully deposited a total of eighteen thousand, three hundred and twenty-five dollars (\$18,325.00) in cash to Enid '94 and Enid '96, in violation of 2 U.S.C. § 441g and 11 C.F.R. § 110.4(c). (See Exhibit 3). In addition, Joseph P. Waldholtz knowingly and willfully failed to disclose these contributions, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. §§ 104.3(a)(4)(i) and 104.14(d).

COMMINGLING PERSONAL AND CAMPAIGN FUNDS

A. BACKGROUND

- 41. During the period he served as Treasurer of Enid '94 and Enid '96, Joseph P. Waldholtz had access to and control over four (4) separate personal checking accounts at First Security Bank in Salt Lake City, Utah:
- (a) Account number (hereinafter the "07 Account") was opened as a joint checking account under the names Joseph P. Waldholtz and Enid Greene Waldholtz on November 30, 1993 and was used by Joseph P. Waldholtz until it was closed on June 1, 1994. (See Exhibit 32, which is incorporated herein by reference).
- (b) Account number (hereinafter the "51 Account") was opened as a joint checking account under the names Joseph P. Waldholtz and Enid Greene Waldholtz on May 3, 1994 and was used extensively by Joseph P. Waldholtz until it was closed on July 19, 1995. (See Exhibit 33, which is incorporated herein by reference).
- (c) Account number (hereinafter the "67 Account") was opened as a joint checking account under the names Joseph P. Waldholtz and Enid Greene Waldholtz on July 19, 1995 and was used extensively by Joseph P. Waldholtz until it was closed in November, 1995. (See Exhibit 34, which is incorporated herein by reference).
- (d) Account number (hereinafter the "69 Account") was opened by Enid Greene on October 8, 1986.

Joseph P. Waldholtz was added to the account on October 29, 1993 and he used the account periodically until it was closed in November, 1995. (See Exhibit 35, which is incorporated herein by reference).

- (e) Account number (hereinafter the "96 Account") was opened by Joseph P. Waldholtz on May 19, 1993. Enid Greene Waldholtz was added to the account on October 13, 1993. The account was closed on January 20, 1994. (See Exhibit 36, which is incorporated herein by reference).
- 42. During the period he served as Treasurer of Enid '94 and Enid '96, Joseph P. Waldholtz also had access to and control over two (2) separate personal checking accounts at the Wright Patman Congressional Federal Credit Union in Washington, D.C.:
- (a) Account number (hereinafter the "412 Account") was opened as a joint checking account under the names Joseph P. Waldholtz and Enid Greene Waldholtz on January 10, 1995 and was used by Joseph P. Waldholtz until it was closed on September 30, 1995. (See Exhibit 37, which is incorporated herein by reference).
- (b) Account number (hereinafter the "413
 Account") was also opened as a joint checking account under the names Joseph P. Waldholtz and Enid Greene Waldholtz on
 January 10, 1995 and was used by Joseph P. Waldholtz until it was closed in August, 1995. (See Exhibit 38, which is incorporated herein by reference).

- 43. On information and belief, during the period he served as Treasurer of Enid '94 and Enid '96, Joseph P. Waldholtz also had access to and control over at least three (3) additional personal banking accounts at Pittsburgh, Pennsylvania-area financial institutions:
- (a) On information and belief, Joseph P. Waldholtz had access to and control over a Merrill Lynch Cash Management

 Account (account number) at Mellon Bank in Pittsburgh,

 Pennsylvania for at least a portion of the time he served as

 Treasurer of Enid '94 and Enid '96.
- (b) On information and belief, Joseph P. Waldholtz also had access to a bank account (account number) in the name of his mother, Barbara Waldholtz, at a branch of Dollar Bank located at 5822 Forbes Avenue, Pittsburgh, Pennsylvania for at least a portion of the time he served as Treasurer of Enid '94 and Enid '96.
- (c) On information and belief, Joseph P. Waldholtz also had access to a bank account (account number) in the name of his grandmother, Rebecca Levenson, at Pittsburgh National Bank, Pittsburgh, Pennsylvania for at least a portion of the time he served as Treasurer of Enid '94 and Enid '96.

B. TRANSFERRING FUNDS FROM CAMPAIGN TO PERSONAL ACCOUNTS

44. During the time he served as Treasurer of Enid '94 and Enid '96, Joseph P. Waldholtz, in a series of twenty-five (25) transactions, knowingly and willfully transferred a total of sixty-three thousand, three hundred seventy-four dollars and

fifty-two cents (\$63,374.52) directly from Enid '94 and Enid '96 campaign accounts into personal accounts controlled by him or in the name of his family, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15:

	DATE	THUUNE	FROM ACCOUNT	TO ACCOUNT
1.	02/14/94	\$300.00		
2.	02/15/94	\$1,400.00		
3.	02/16/94	\$300.00		
4.	03/31/94	\$3,000.00		
5.	04/04/94	\$4,200.00		
6.	10/19/94	\$15,000.00		
7.	01/12/95	\$20,000.00		
8.	04/26/95	\$2,500.00		
9.	04/27/95	\$2,000.00		
10.	05/11/95	\$1,000.00		
11.	05/12/95	\$650.00		
12.	05/22/95	\$200.00		
13.	05/23/95	\$3,000.00		
14.	05/25/95	\$500.00		
15.	05/25/95	\$400.00		
16.	05/25/95	\$2,000.00		
17.	05/26/95	\$3,100.00		
18.	05/30/95	\$200.00		
19.	05/31/95	\$1,200.00		
20.	06/07/95	\$50.00		
21.	06/08/95	\$750.00		
22.	06/12/95	\$500.00		
23.	06/21/95	\$736.93		
24.	07/19/95	\$46.58		
25.	08/09/95	\$341.01		
	TOTAL:	\$63,374.52	•	

(See also Exhibit 4).

- 45. As indicated by item four (4) in the preceding chart, on information and belief, on March 31, 1994, Joseph P. Waldholtz knowingly and willfully authorized a wire transfer of three thousand dollars (\$3,000.00) from the Enid '94 Account to an account in the name of his mother, Barbara Waldholtz, at the branch of Dollar Bank located at 5822 Forbes Avenue, Pittsburgh, Pennsylvania, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. (See Exhibit 39, which is incorporated herein by reference). There is no identifiable legitimate campaign purpose for this wire transfer. On information and belief, Joseph P. Waldholtz knowingly and willfully failed to report this disbursement on the April 15 Quarterly Report, in violation of 2 U.S.C. § 434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d). (See Exhibit 15).
- 46. As indicated by item five (5) in the preceding chart, on information and belief, on April 4, 1994, Joseph P. Waldholtz knowingly and willfully authorized a wire transfer of four thousand, two hundred dollars (\$4,200.00) from the Enid '94 Account to his personal Merrill Lynch account (number) at Mellon Bank in Pittsburgh, Pennsylvania, in violation of 2 U.S.C. \$ 432(b)(3) and 11 C.F.R. § 102.15. (See Exhibit 40, which is incorporated herein by reference). There is no identifiable campaign purpose for this wire transfer. In addition, on information and belief, Joseph P. Waldholtz knowingly and willfully failed to report this disbursement on the Twelfth Day

Report preceding the Utah Republican Convention, in violation of 2 U.S.C. § 434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d). (See Exhibit 16).

- 47. As indicated by item sixteen (16) on the preceding chart, on information and belief, on May 25, 1995, Joseph P. Waldholtz knowingly and willfully authorized a wire transfer of two thousand dollars (\$2,000.00) from the Enid '96 Account to an account in the name of his grandmother, Rebecca Levenson, at Pittsburgh National Bank in Pittsburgh, Pennsylvania, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. (See Exhibit 41, which is hereby incorporated by reference). There is no identifiable legitimate campaign purpose for this wire transfer. In addition, on information and belief, Joseph P. Waldholtz knowingly and willfully failed to report this disbursement on the July 31 Mid-Year Report, in violation of 2 U.S.C. § 434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d). (See Exhibit 27).
- 48. As indicated by the remaining twenty-two (22) transactions itemized in the preceding chart, on information and belief, Joseph P. Waldholtz knowingly and willfully transferred a total of fifty-four thousand, one hundred and seventy-four dollars and fifty-two cents (\$54,174.52) from the Enid '94 and Enid '96 accounts to his personal accounts at First Security Bank, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. (See preceding chart and Exhibit 31). There is no supporting documentation in the Enid '94 and '96 records

indicating that any of these transfers served a legitimate campaign purpose. In addition, on information and belief, Joseph P. Waldholtz knowingly and willfully failed to report any of these disbursements, as required by 2 U.S.C. § 434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d). (See Exhibits 15, 16, 20 and 27).

C. STOLEN CAMPAIGN CONTRIBUTION CHECKS

49. On information and belief, on four separate occasions, Joseph P. Waldholtz knowingly and willfully misappropriated campaign contribution checks, delivered to him and made payable to the Send Enid Greene to Congress Committee (the original name of Enid '94), and deposited them into the 96 Account, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. A total of thirty-six (36) checks, primarily from small contributors, worth a total of two thousand, eight hundred and eighty-three dollars (\$2,883.00) were diverted from the Enid '94 account in this way. There is nothing in the bank records to indicate that this amount was ever transferred back to either the Enid '94 Account or the Enid '94-2 Account. (See Exhibit 5).

D. CASH WITHDRAWALS

50. On information and belief, on at least twenty-four (24) occasions, Joseph P. Waldholtz knowingly and willfully withdrew a total of twenty-five thousand, nine hundred and fifty dollars (\$25,950.00) in cash from the Enid '94 and Enid '96 accounts and commingled it with his own personal funds, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. In addition, on

information and belief, Joseph P. Waldholtz knowingly and willfully failed to report any of these disbursements, in violation of 2 U.S.C. § 434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d).

1. Withdrawals By Checks Made Payable to Cash

On at least twelve (12) separate occasions during the time he served as Treasurer of Enid '94 and Enid '96, Joseph P. Waldholtz knowingly and willfully signed campaign or counter checks made payable to "Cash" and used them to withdraw a total of six thousand, two hundred dollars (\$6,200.00) from the Enid '94 and Enid '96 accounts. (See Exhibit 6). While one (1) of the checks bears a notation regarding its supposed purpose ("expenses tonite - 1/26/94"), on information and belief, there is no supporting documentation in the Enid '94 or Enid '96 records indicating that any of these checks were issued for legitimate campaign reasons. On information and belief, Joseph P. Waldholtz commingled these funds withdrawn from the Enid '94 and Enid '96 accounts with his own personal funds, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. In addition, on information and belief, Joseph P. Waldholtz knowingly and willfully failed to report any of these disbursements, in violation of 2 U.S.C. § 434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d).

2. Withdrawals By Checks Made Payable to Himself

52. On at least seven (7) occasions while he was Treasurer of Enid '94 and Enid '96, Joseph P. Waldholtz knowingly and

willfully signed campaign or counter checks made payable to himself and used them to withdraw a total of five thousand, five hundred dollars (\$5,500.00) from the Enid '94 accounts. (See Exhibit 7). While one (1) of the checks bears a notation regarding its supposed purpose ("Lincoln Day Dinner"), on information and belief, there is no supporting documentation in the Enid '94 or Enid '96 records indicating that any of these checks were issued for legitimate campaign reasons. On information and belief, Joseph P. Waldholtz commingled these funds withdrawn from the Enid '94 and Enid '96 accounts with his own personal funds, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. In addition, on information and belief, Joseph P. Waldholtz knowingly and willfully failed to report any of these disbursements, in violation of 2 U.S.C. § 434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d).

- 3. Withdrawals By Checks Made Payable to Enid Greene Waldholtz
- 53. On at least three (3) occasions while he was Treasurer of Enid '96, Joseph P. Waldholtz knowingly and willfully issued campaign or counter checks, drawn on Enid '96 accounts, worth a total of eight thousand dollars (\$8,000.00), and made payable to Enid Greene Waldholtz. (See Exhibit 8). While all three (3) of these checks were deposited into the personal checking account shared by Joseph P. Waldholtz and Enid Greene Waldholtz at the Congressional Federal Credit Union, none were endorsed by her.

On May 8, 1995, Joseph P. Waldholtz knowingly and willfully issued a counter check, drawn on the Enid '96 Account, in the amount of three thousand dollars (\$3,000.00) and made payable to Enid Greene Waldholtz. (See Exhibit 8). While the check bears the handwritten notation "reimbursement," Enid Greene Waldholtz is not aware of any reimbursement checks issued to her by Enid '96. Moreover, nothing found in the Enid '96 records to date supports the characterization of this check as a reimbursement. Accordingly, on information and belief, there is no identifiable legitimate campaign purpose for this check, and Joseph P. Waldholtz deposited the check, without the endorsement of Enid Greene Waldholtz, into the 412 Account at the Congressional Federal Credit Union, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. In addition, on information and belief, Joseph P. Waldholtz knowingly and willfully failed to report this disbursement on the July 31 Mid-Year Report, in violation of 2 U.S.C. § 434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d). (See Exhibit 27).

(b) On June 18, 1995, Joseph P. Waldholtz knowingly and willfully issued an Enid '96 Account check in the amount of two thousand dollars (\$2,000.00) made payable to Enid Greene Waldholtz. (See Exhibit 8). While the check bears the handwritten notation "reimbursement," Enid Greene Waldholtz is not aware of any reimbursement checks issued to her by Enid '96. Moreover, nothing found in the Enid '96 records to date supports the characterization of this check as a reimbursement.

Accordingly, on information and belief, there is no identifiable campaign purpose for this check, and Joseph P. Waldholtz deposited the check, without the endorsement of Enid Greene Waldholtz, into the 412 Account at the Congressional Federal Credit Union, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. In addition, on information and belief, Joseph P. Waldholtz knowingly and willfully failed to report this disbursement on the July 31 Mid-Year Report, in violation of 2 U.S.C. § 434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d). (See Exhibit 27).

(c) On June 20, 1995, Joseph P. Waldholtz knowingly and willfully issued an Enid '96 Account check in the amount of three thousand dollars (\$3,000.00) made payable to Enid Greene Waldholtz. (See Exhibit 8). On information and belief, there is no identifiable campaign purpose for this check, and Joseph P. Waldholtz deposited the check, without the endorsement of Enid Greene Waldholtz, into the 412 Account at the Congressional Federal Credit Union, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. In addition, on information and belief, Joseph P. Waldholtz knowingly and willfully failed to report this disbursement on the July 31 Mid-Year Report, in violation of 2 U.S.C. § 434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d). (See Exhibit 27).

4. Using Campaign Funds to Pay Personal Bills

- 54. On information and belief, on February 16, 1994, Joseph P. Waldholtz knowingly and willfully obtained and signed a counter check, drawn on the Enid '94 Account, in the amount of one thousand dollars (\$1,000.00) to make a payment to a personal First Security Bank VISA account, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. (See Exhibit 9). Nothing found in the Enid '94 records to date indicates that this credit card payment was intended as reimbursement for a legitimate campaign expense. In addition, on information and belief, Joseph P. Waldholtz knowingly and willfully failed to report this disbursement on the April 15 Quarterly Report, as required by 2 U.S.C. § 434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d). (See Exhibit 15).
- 55. On information and belief, on November 28, 1994, Joseph P. Waldholtz knowingly and willfully authorized a debit memo to transfer five thousand dollars (\$5,000.00) from the Enid '94-2 Account to a personal First Security Bank VISA account, in violation of 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. (See Exhibit 9). Nothing found in the Enid '94 records to date indicates that this credit card payment was intended as reimbursement for a legitimate campaign expense. In addition, on information and belief, Joseph P. Waldholtz knowingly and willfully failed to report this disbursement on the Thirtieth Day Report following the General Election, as required by 2 U.S.C. §

434(b)(6)(A) and 11 C.F.R. §§ 104.3(b)(4)(vi) and 104.14(d). (See Exhibit 22).

OTHER VIOLATIONS

- Report, Joseph P. Waldholtz knowingly and willfully identified falsely as contributors forty-three (43) individuals who either do not exist or did not contribute at all to the Enid '94 campaign. (See Exhibits 15 and 42, which is incorporated herein by reference). The inclusion of these forty-three (43) "ghost" contributors on the April 15 Quarterly Report caused that report to overstate by sixty-six thousand, four hundred and fifty dollars (\$66,450.00) the actual amount contributed by individuals to Enid '94 in the first quarter of 1994, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. §§ 104.3(a)(4)(i) and 104.14(d).
- 57. On information and belief, on the April 15 Quarterly Report, Joseph P. Waldholtz knowingly and willfully failed to report two (2) individual one thousand dollar (\$1,000) contributions to Enid '94, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. §§ 104.3(a)(4)(i) and 104.14(d). (See Exhibits 15 and 43, which is incorporated herein by reference).
- 58. On information and belief, Joseph P. Waldholtz also knowingly and willfully failed to report an additional eight (8) contributions in excess of two hundred dollars (\$200.00) made to Enid '94 between June 8, 1994 and December 28, 1994, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. §§ 104.3(a)(4)(i) and

104.14(d). (See Exhibits 17, 18, 20, 22, 23, and 44, which is incorporated herein by reference).

- 59. On information and belief, on at least one (1) occasion, Joseph P. Waldholtz also knowingly and willfully accepted a corporate contribution, in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.2(c). (See Exhibit 45, which is incorporated herein by reference).
- 60. On information and belief, Joseph P. Waldholtz knowingly and willfully reported falsely on the Thirtieth Day Report following the General Election a one thousand dollar (\$1,000.00) corporate contribution by Keystone Promotions as an individual contribution by Richard Call, the owner of Keystone Promotions, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. §§ 104.3(a)(4)(i) and 104.14(d). (See Exhibits 22 and 46, which is incorporated herein by reference).

REQUEST FOR COMMISSION AUDIT AND INVESTIGATION

61. Complainants know of at least three (3) bank accounts in the Pittsburgh, Pennsylvania area to which Joseph P. Waldholtz transferred funds belonging to Enid '94 and Enid '96. See Paragraph 43. Because of bank confidentiality laws, Complainants cannot obtain the records of these accounts. In addition, Complainants believe that Joseph P. Waldholtz may have improperly used his personal credit cards to pay for legitimate campaign expenses, but cannot obtain the bank records needed to determine whether or not such transactions occurred. While Complainants have exercised extraordinary diligence in attempting to correct

the reports of receipts and disbursements filed by Joseph P. Waldholtz, a true and complete record of the financial activities of Enid '94 and Enid '96 cannot be constructed without access to these records. Accordingly, Complainants request that the Federal Election Commission conduct an audit of Enid '94 and Enid '96 pursuant to 2 U.S.C. § 438(b) and use its subpoena powers to obtain the personal bank records of Joseph P. Waldholtz and members of his family.

62. Given the scope and magnitude of the violations of the Federal Election Campaign Act and applicable Federal Election Commission regulations committed by Joseph P. Waldholtz, Complainants respectfully request that the Federal Election Commission seek, in any conciliation effort or subsequent enforcement proceeding, to have Joseph P. Waldholtz repay to Enid '94 and Enid '96 (a) all committee funds he embezzled and illegally commingled with personal funds, as well as (b) an amount equivalent to the total amount Joseph P. Waldholtz obtained from D. Forrest Greene and subsequently contributed to Enid '94 and Enid '96. Complainants will, of course, refund any recovered funds to D. Forrest Greene, in accordance with 11 C.F.R. § 103.3(b)(3).

For the foregoing reasons, Complainants ask that the Federal Election Commission find reason to believe that Joseph P. Waldholtz committed multiple violations of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431, et seq., and applicable Federal Election Commission regulations.

Dated: March 8, 1996

Respectfully submitted,

Michael H. Chanin

Powell, Goldstein, Frazer & Murphy 1001 Pennsylvania Avenue, N.W. Washington, D.C. 20004

(202) 347-0066

Counsel to Enid '94, Enid '96 and Enid Greene Waldholtz as Treasurer of Enid '94 and Enid '96

Washington)

SS:

L. Edward

District of Columbia)

MICHAEL H. CHANIN, known to me to be the person who signed the foregoing Complaint as counsel to the Complainants, being duly sworn, stated that the statements contained therein are true, except those statements made on information and belief or as a report of information provided by Coopers & Lybrand L.L.P., which he believes to be true.

IN WITNESS WHEREOF, I have set my hand and seal as a notary public this day of March, 1996.

Notary Public

My Commission Expires: / Motory Purist District of Commission

Oynthia E. Edwards

Notary Public District of Columbia
My Commission Expires June 14, 1998

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EXHIBITS

- 1. Contributions in Excess of \$1,000 to ENID '94 in 1994 On Information and Belief, Made by Joseph Waldholtz in Enid Waldholtz's Name
- 2. Contributions to ENID '94 and ENID '96 in 1994 and 1995 in Excess of \$1,000 - On Information and Belief, Made by Joseph Waldholtz and Not Reported to the FEC
- 3. On Information and Belief, Cash Contributions Made by Joseph Waldholtz to ENID '94 and ENID '96 in 1994 and 1995
- 4. On Information and Belief, Commingling of Personal Funds and ENID '94 and ENID '96 Campaign Funds By Joseph Waldholtz in 1994 and 1995 Using Transfers from Campaign Accounts Into Personal Accounts"
- 5. On Information and Belief, Deposits of Checks By Joseph Waldholtz Into His Personal Account, Made Payable to Send Enid Greene to Congress
- 6. On Information and Belief, Commingling of Personal Funds and ENID '94 and ENID '96 Funds by Joseph Waldholtz in 1994 and 1995 Using Campaign and Counter Checks Made Payable to Cash
- 7. On Information and Belief, Commingling of Personal Funds and ENID '94 Funds by Joseph Waldholtz in 1994 Using Checks and Counter Checks Made Payable to Joseph Waldholtz
- 8. On Information and Belief, Commingling of Personal Funds and ENID '96 Funds by Joseph Waldholtz in 1995 Using Checks and Counter Checks Made Payable to Enid Waldholtz
- 9. On Information and Belief, Commingling of Personal Funds and ENID '94 Funds by Joseph Waldholtz in 1994 Through Payment of Personal Credit Card Bills
- 10. Signature Card for Account
- 11. Signature Card for Account
- 12. Statement of Candidacy for Enid '94
- 13. Statement of Organization for Enid '94
- 14. ENID '94 January 31 Year End Report
- 15. ENID '94 April 15 Quarterly Report
- 16. ENID '94 Twelfth Day Report preceding Utah Republican Convention
- 17. ENID '94 July 15 Quarterly Report

- 18. ENID '94 Amendment to July 15 Quarterly Report
- 19. ENID '94 October 15 Quarterly Report
- 20. ENID '94 Twelfth Day Report preceding General Election
- 21. ENID '94 Amendment to October 15 Quarterly Report
- 22. ENID '94 Thirtieth Day Report following the General Election
- 23. ENID '94 January 31 Year-End Report
- 24. ENID '94 July 31 Mid-Year Report
- 25. Signature Card for Account
- 26. ENID '96 Statement of Organization
- 27. ENID '96 July Mid-Year Report
- 28. On Information and Belief, Contributions by Joseph Waldholtz in Excess of \$1,000 to ENID '94 in 1994
- 29. On Information and Belief, Contributions in Excess of \$1,000 to ENID '94 in 1994 Made by Joe Waldholtz and Not Reported
- 30. On Information and Belief, Contributions by Joseph Waldholtz in Excess of \$1,000 to ENID '94 in 1995
- 31. On Information and Belief, Contributions by Joseph Waldholtz in Excess of \$1,000 to ENID '96 in 1995
- 32. Signature Card for Account
- 33. Signature Card for Account
- 34. Signature Card for account
- 35. Signature Card for Account
- 36. Signature Card for Account
- 37. Signature Card Account
- 38. Signature Card for Account
- 39. \$3,000 wire transfer to Barbara Waldholtz dated March 31, 1994
- 40. \$4,200 wire transfer to Merrill Lynch account dated April 4, 1994
- 41. \$2,000 wire transfer to Rebecca Levenson dated May 25, 1995

- 42. Enid '94 Comparison of Amounts Reported on Original FEC Reports and Records of Committee Bank Accounts 01/01/94-03/31/94 (lists 43 contributors)
- 43. Enid '94 Comparison of Amounts Reported on Original FEC Reports and Records of Committee Bank Accounts 01/01/94-03/31/94
- 44. Enid '94 Comparison of Amounts Reported on Original FEC Reports and Records of Committee Bank Accounts 04/01/94-12/31/94
- 45. Summary of Corporate Contributors

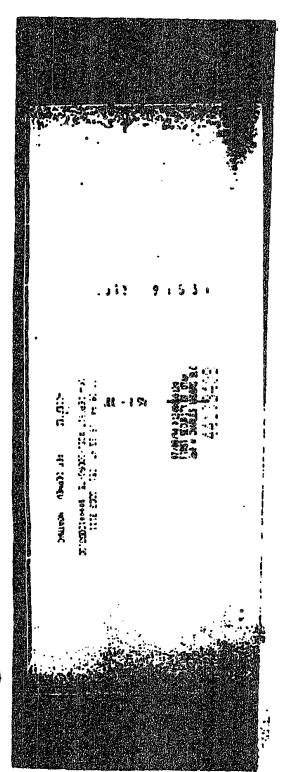
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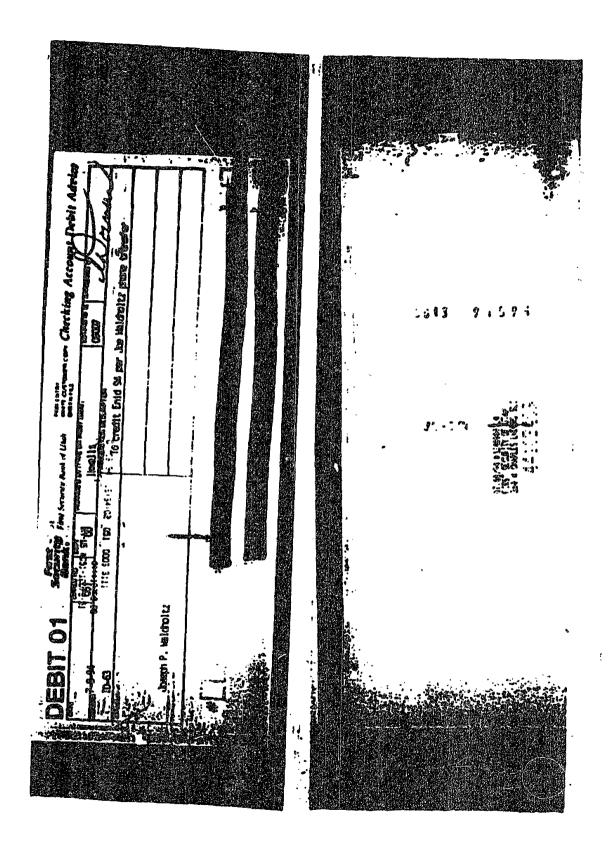
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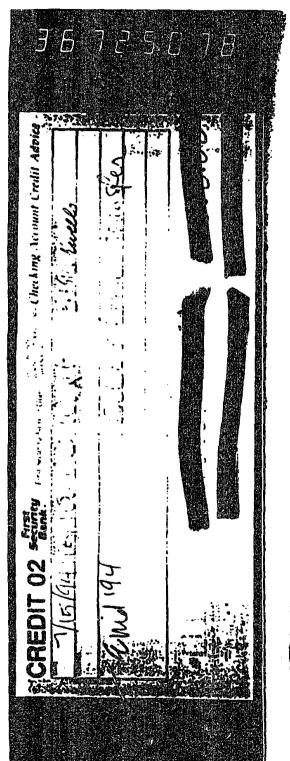
On Information and Belief, Made by Joseph Waldholtz in Enid Waldholtz's Name Contributions in Excess of \$1000 to ENID '94 in 1994

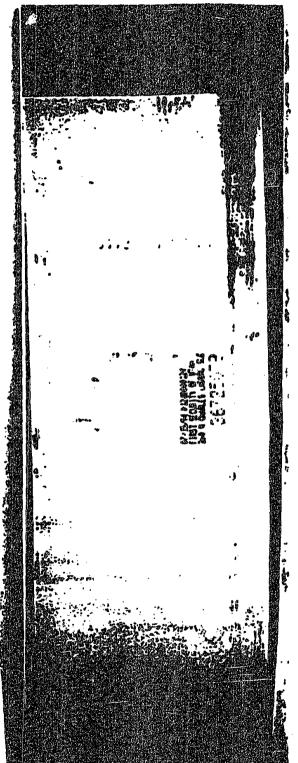
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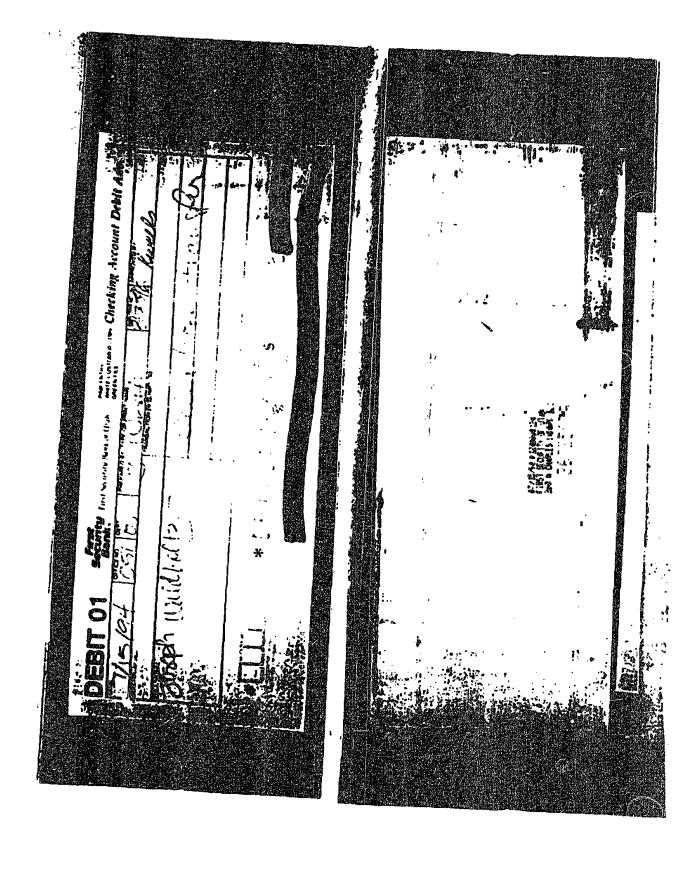
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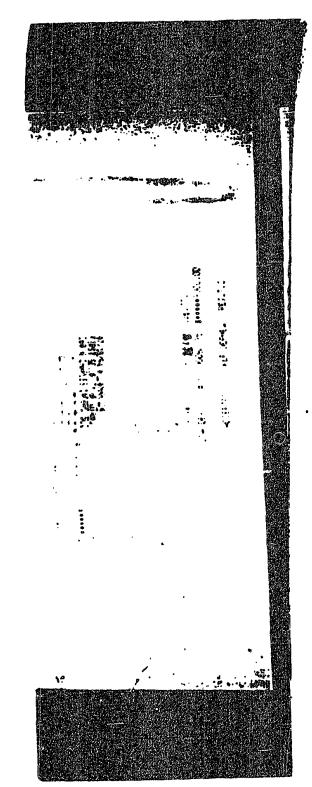




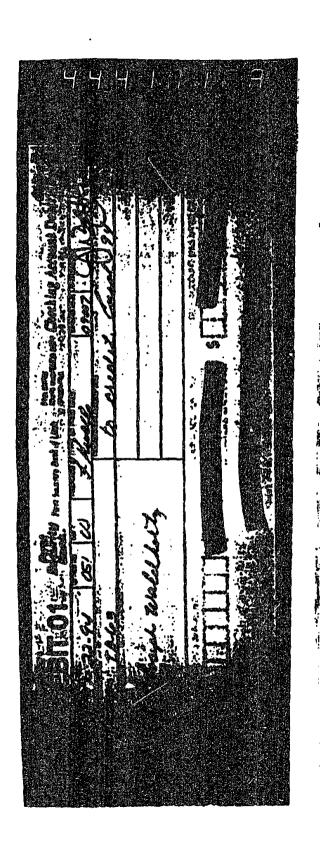


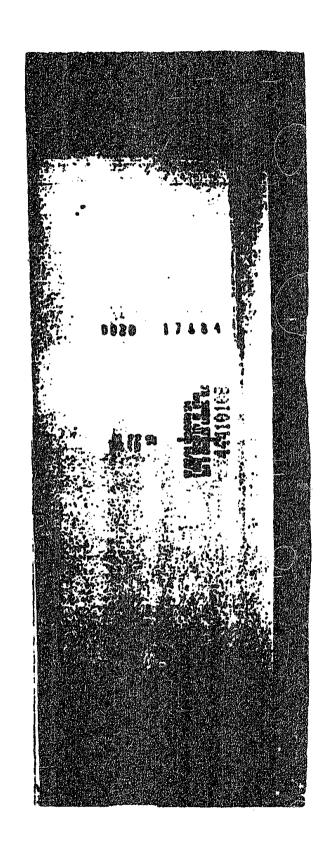


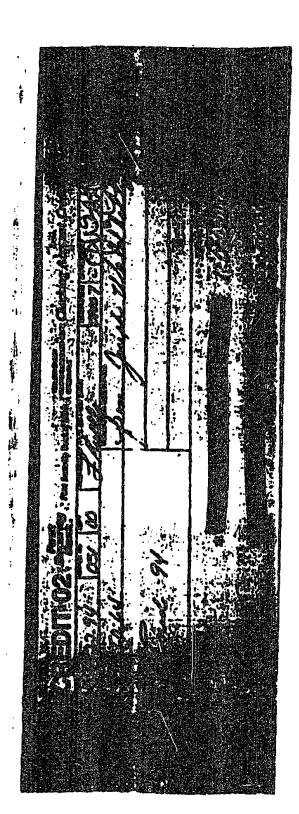
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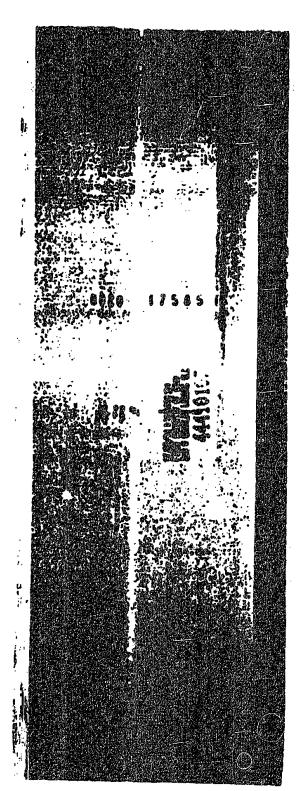


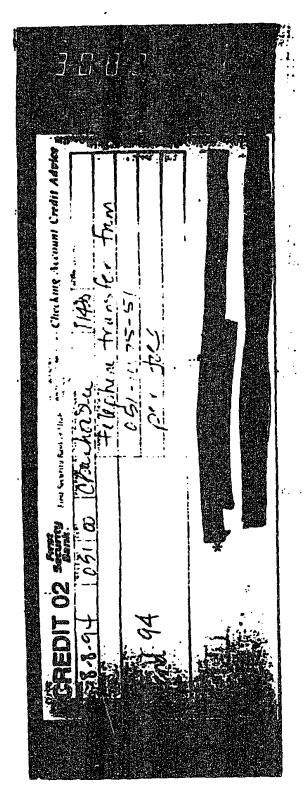
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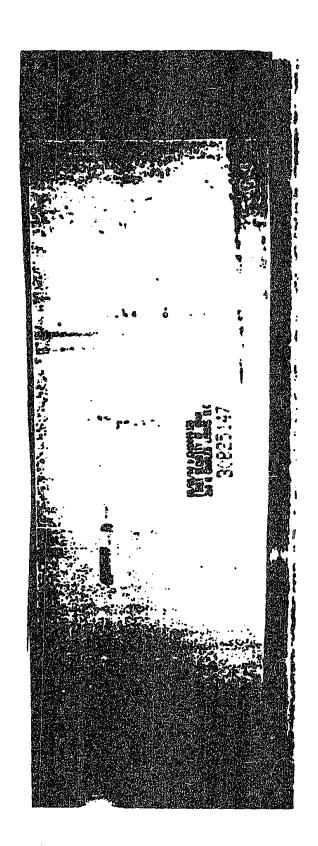




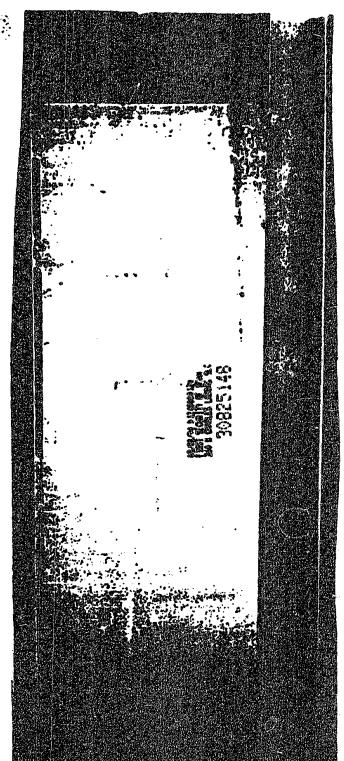


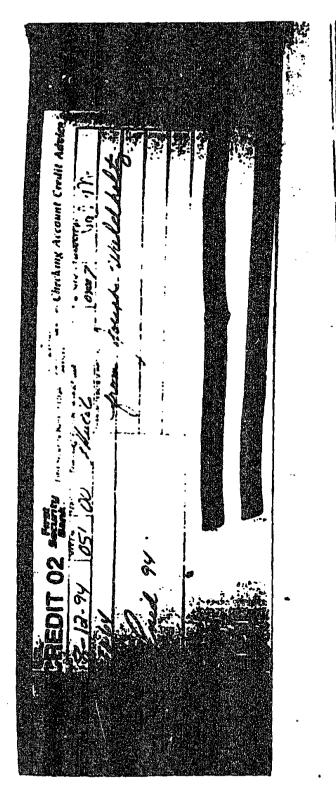


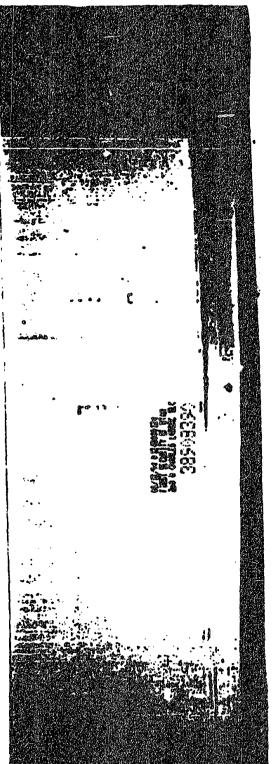




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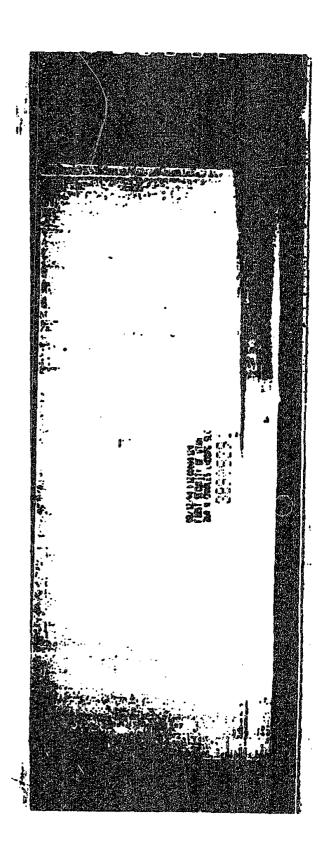


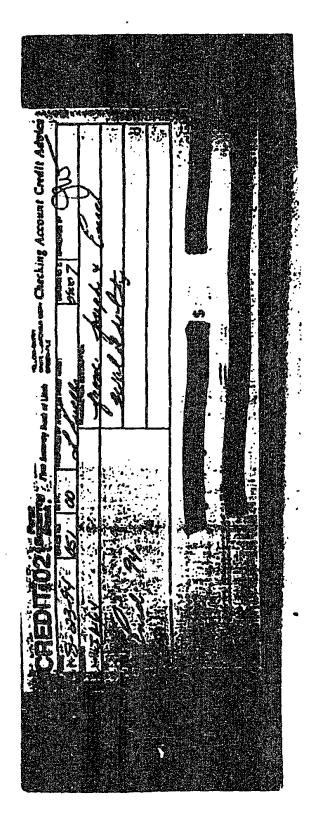


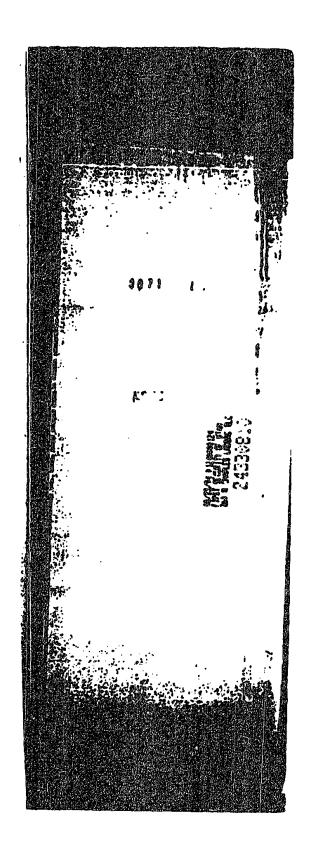


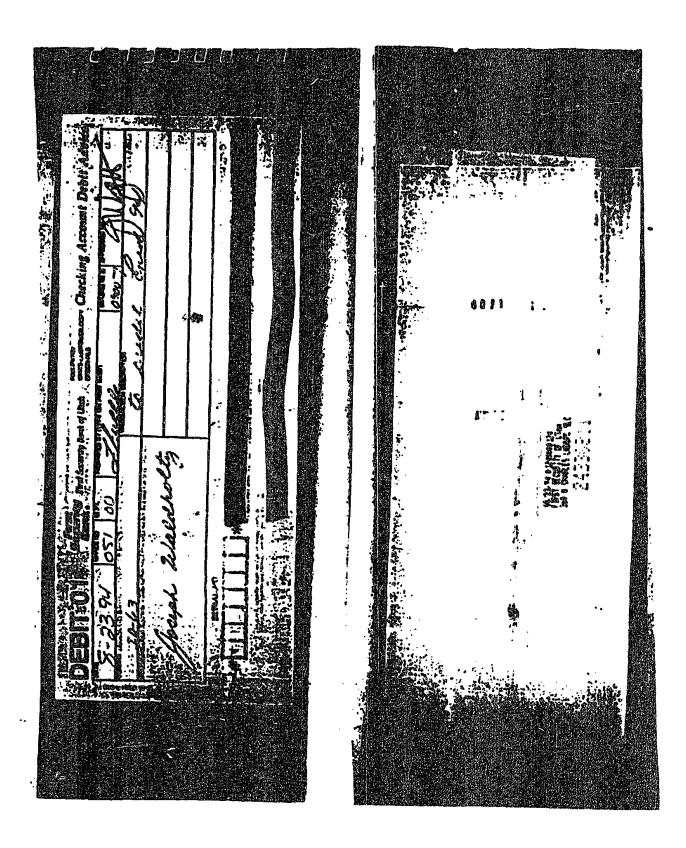
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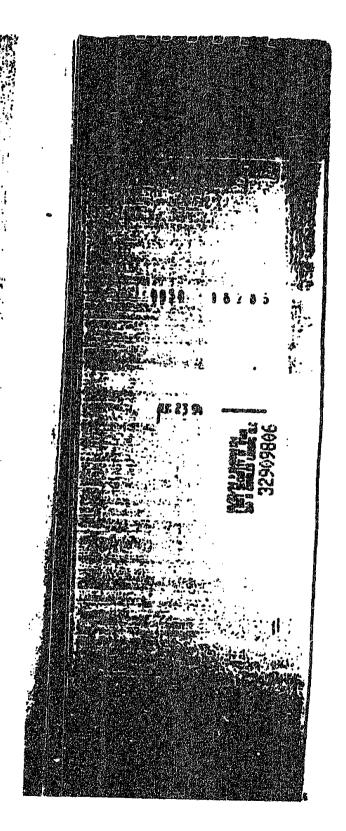


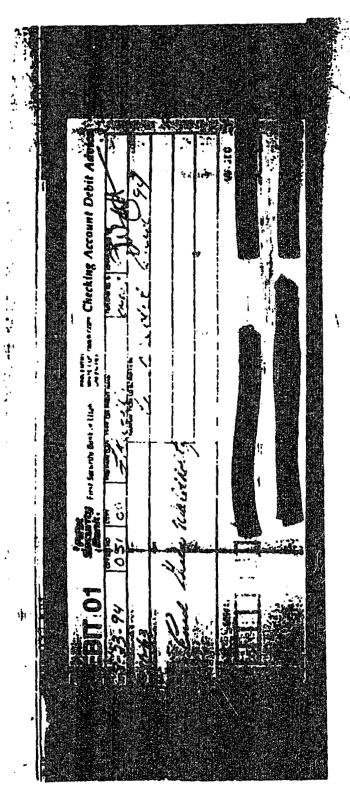


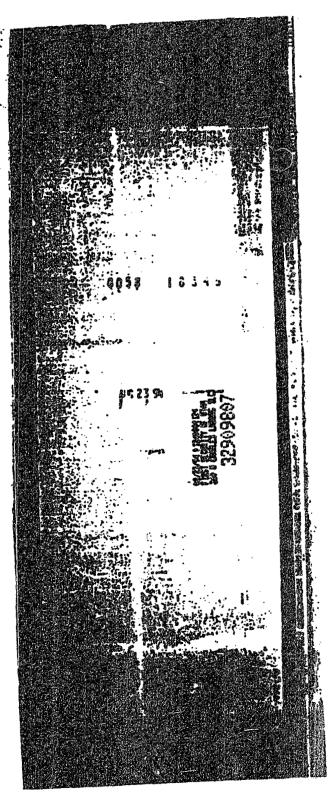


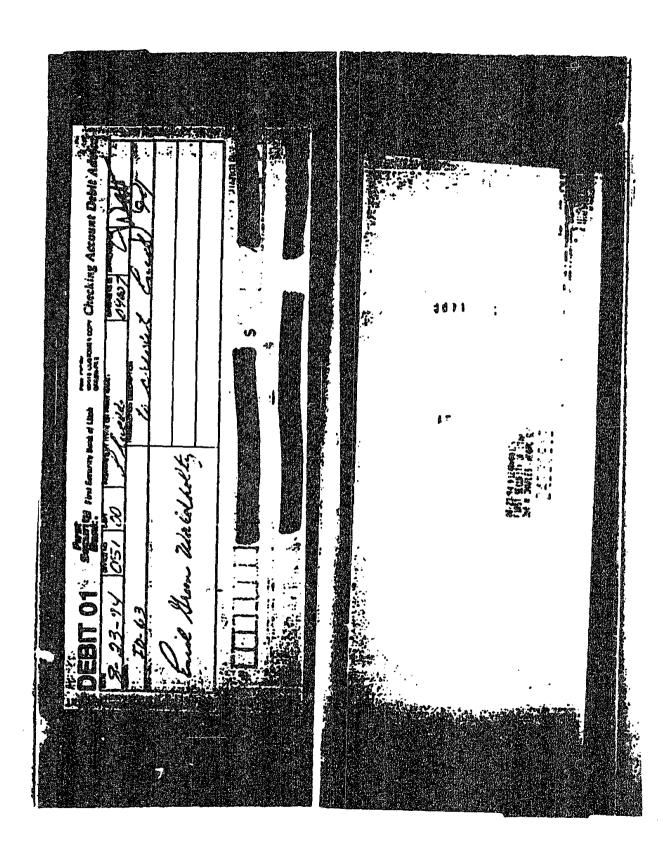


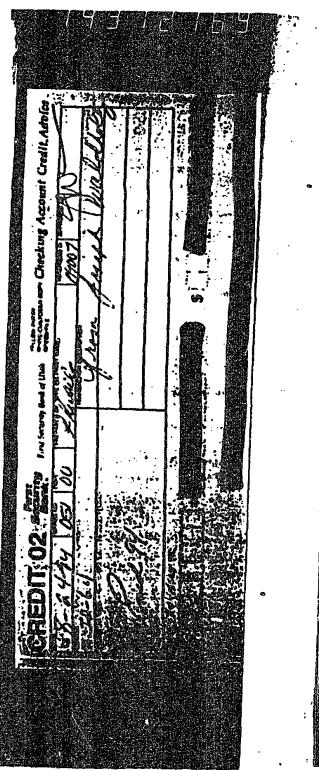
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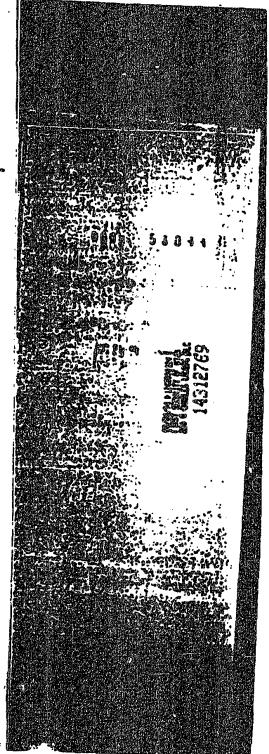


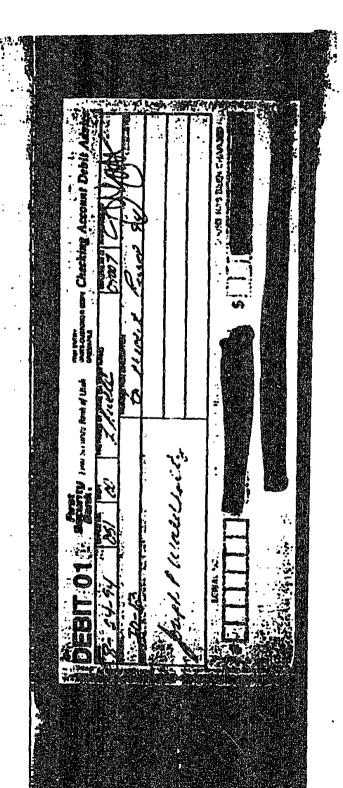


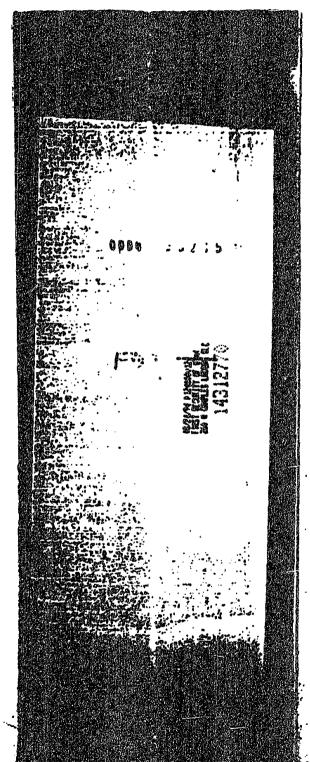


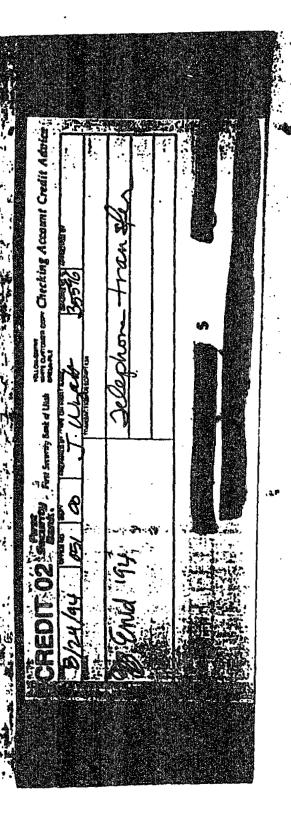


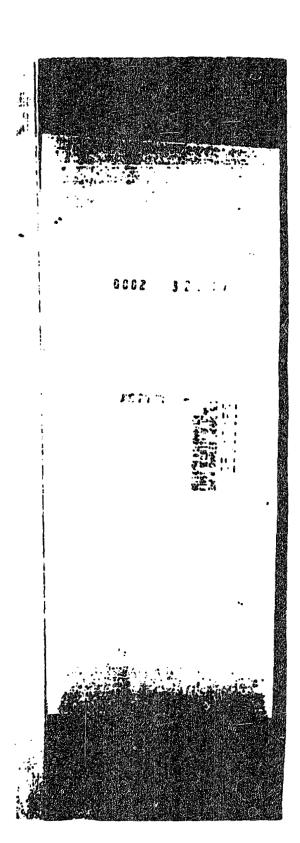


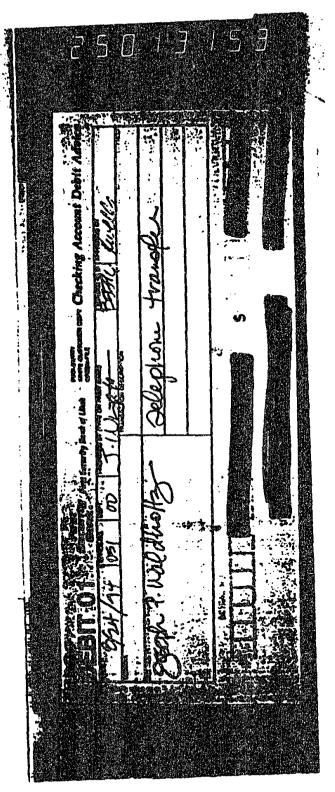


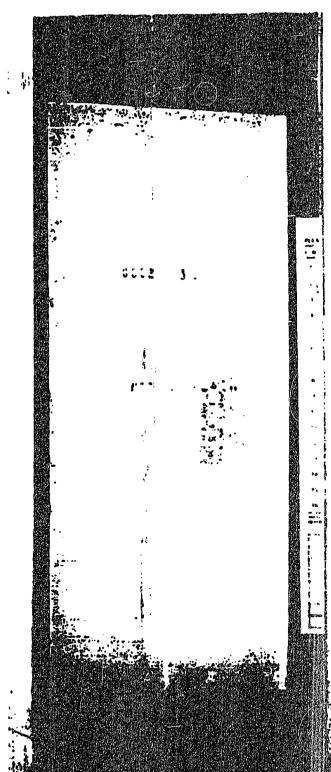


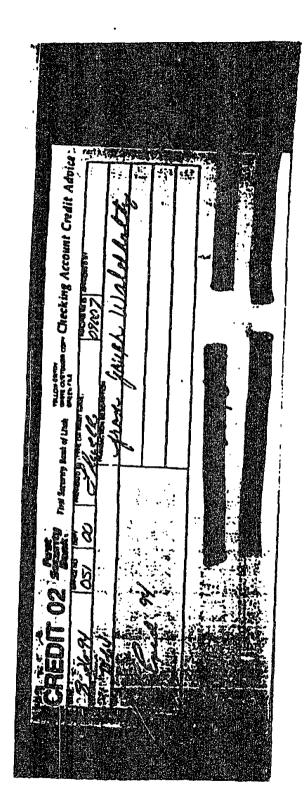


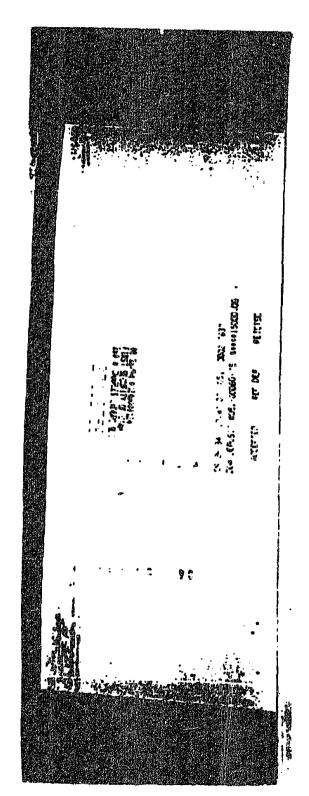


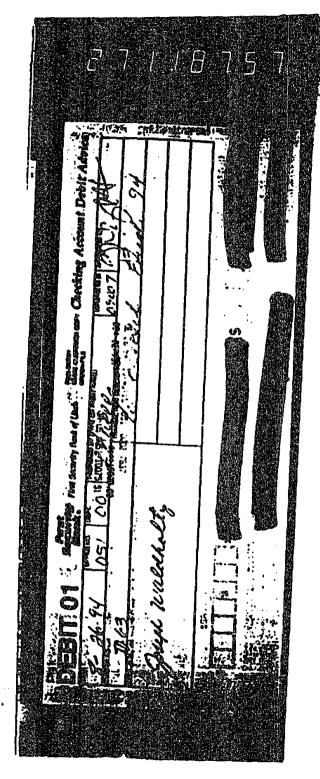


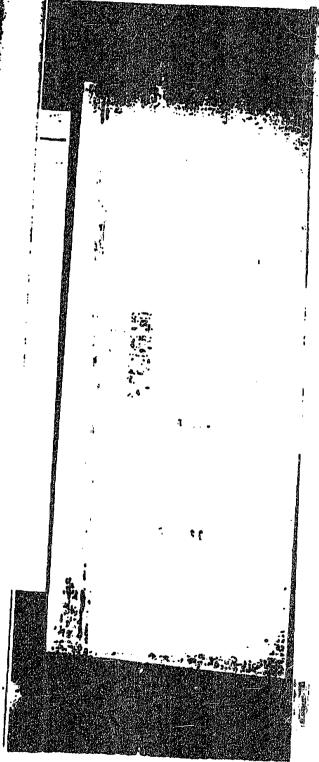


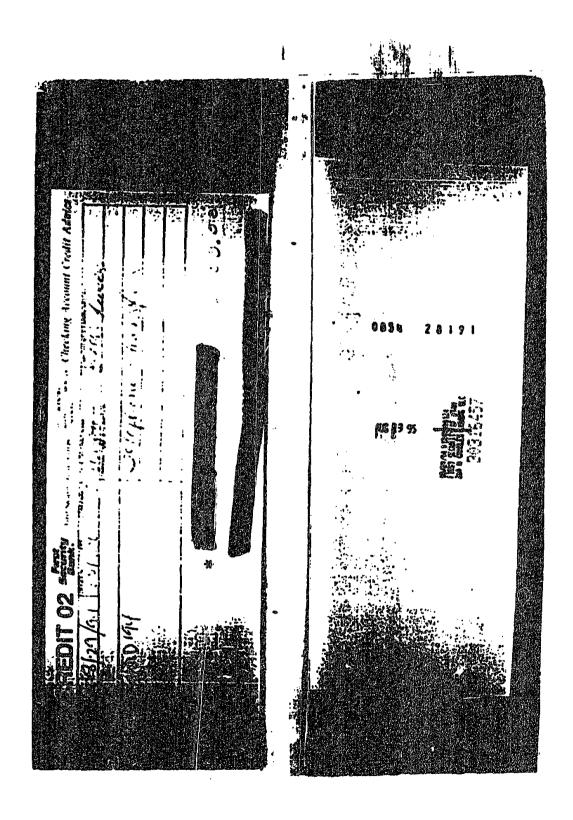


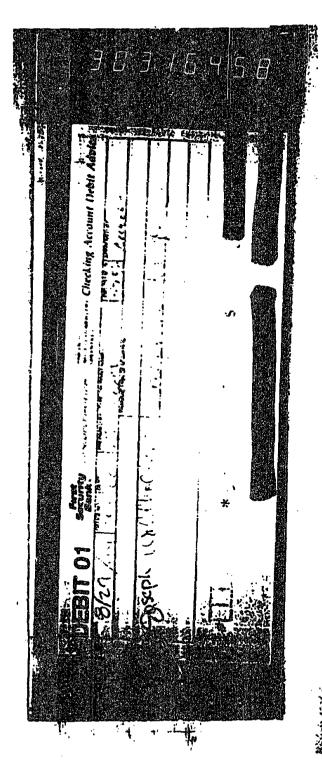


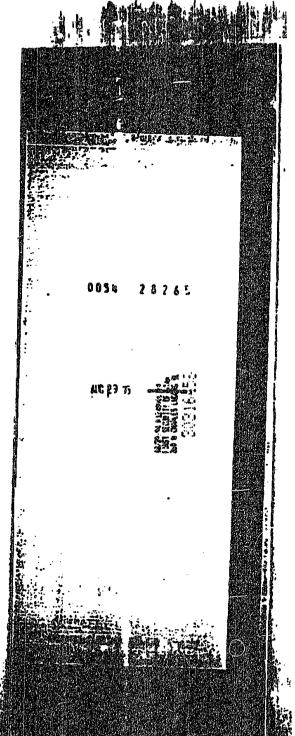




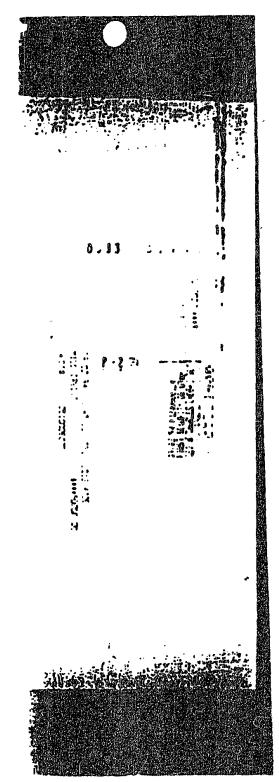


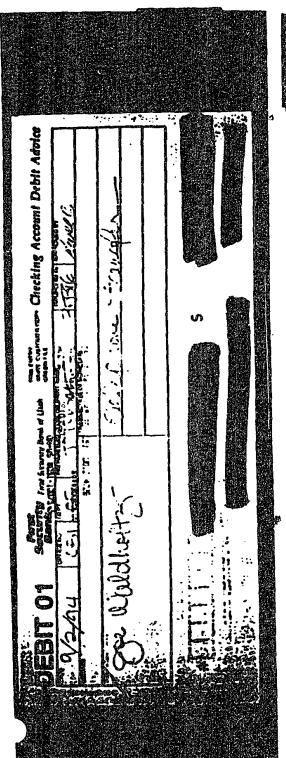


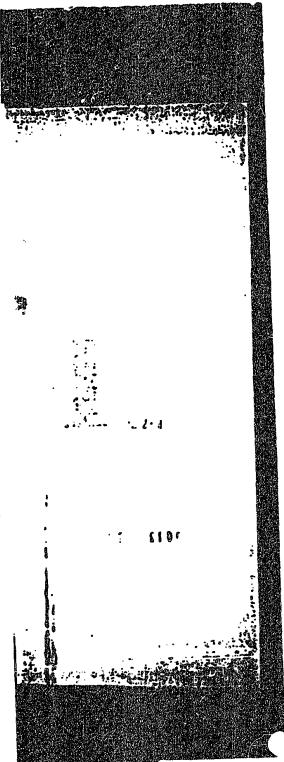




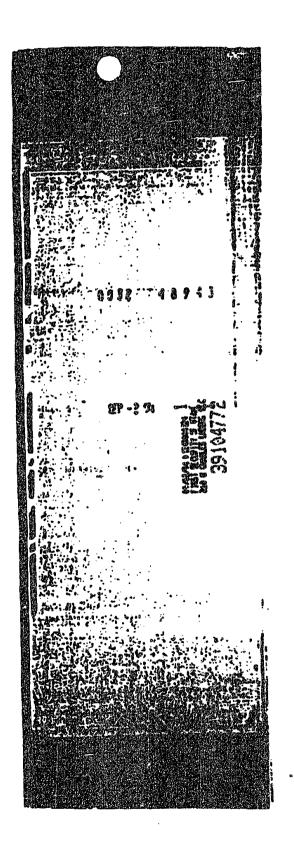
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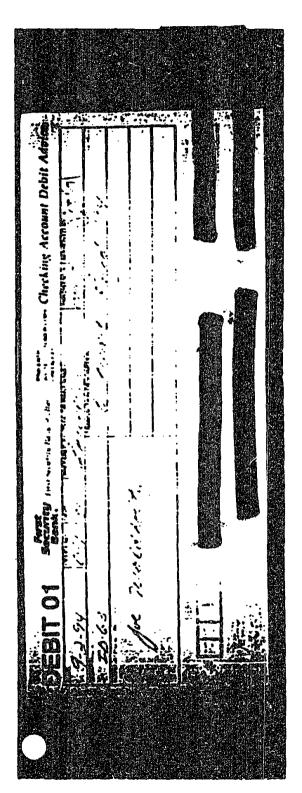


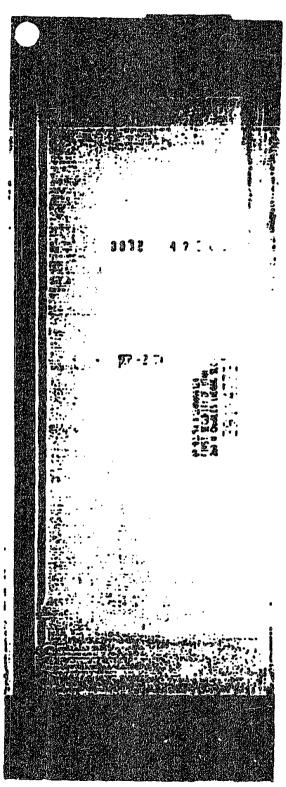




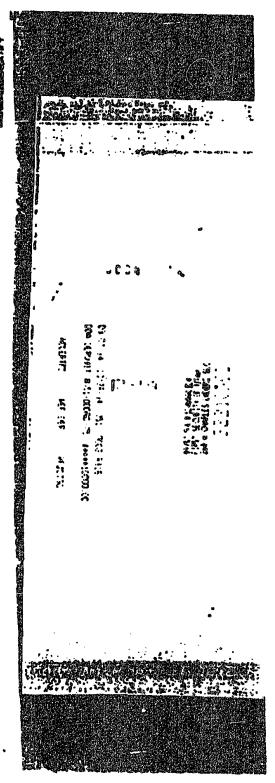
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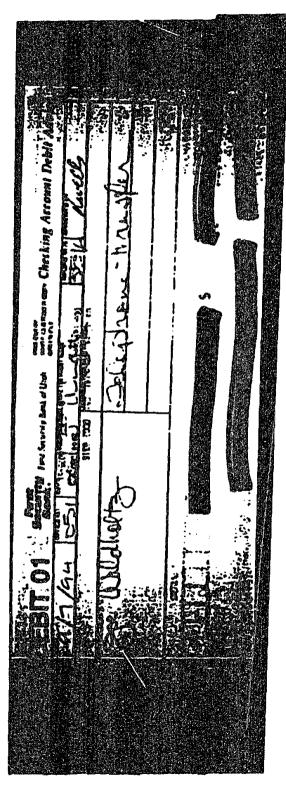


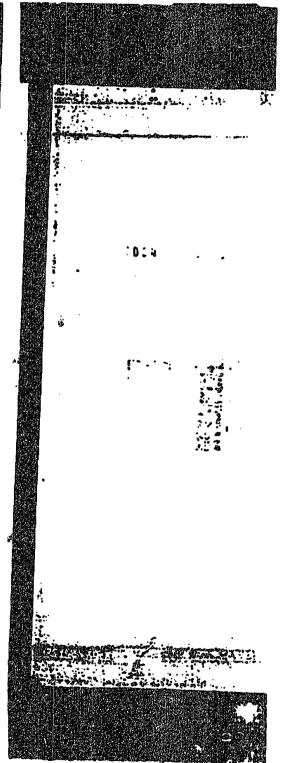


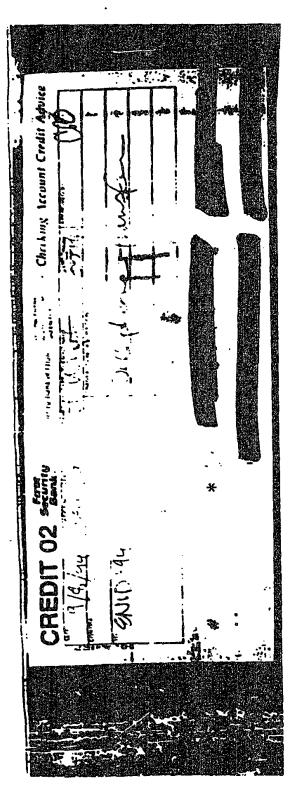


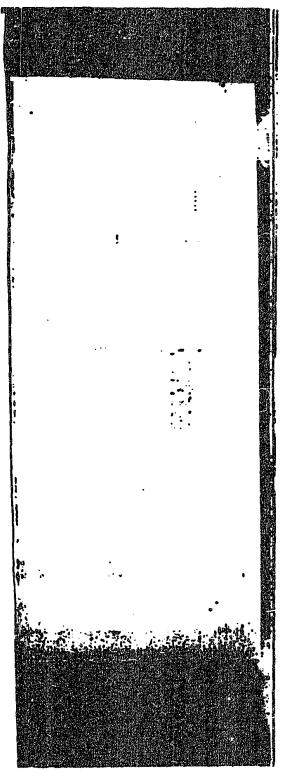
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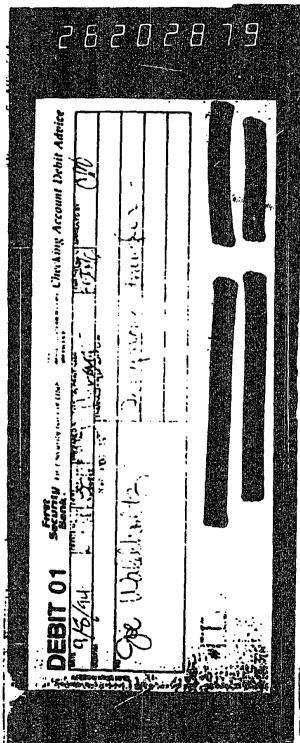


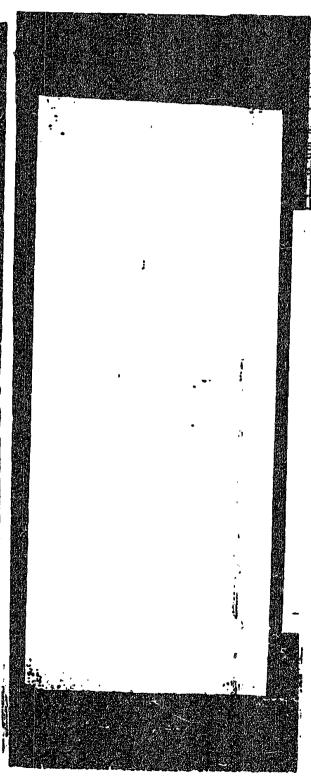


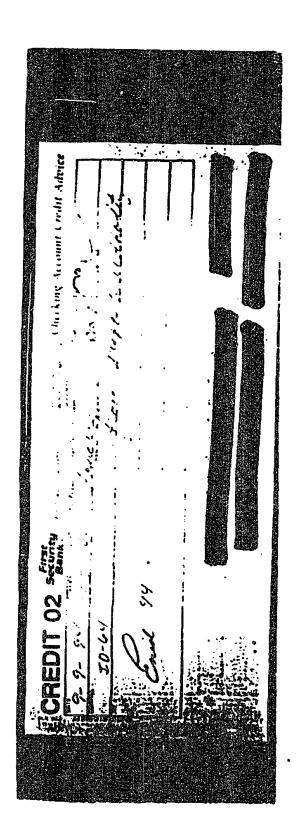


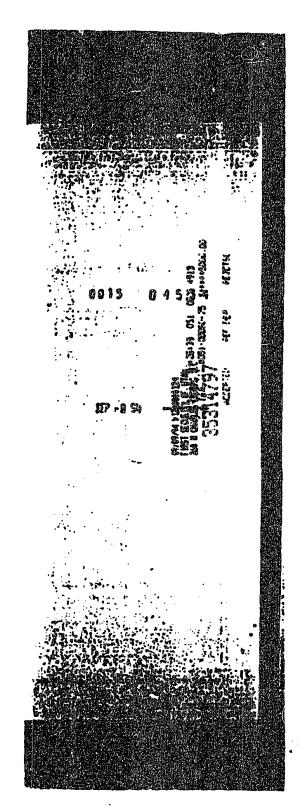


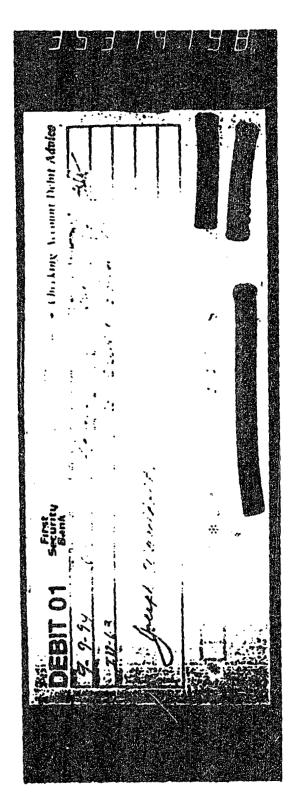


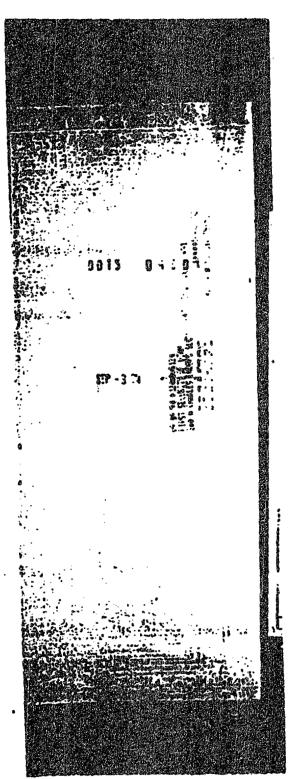


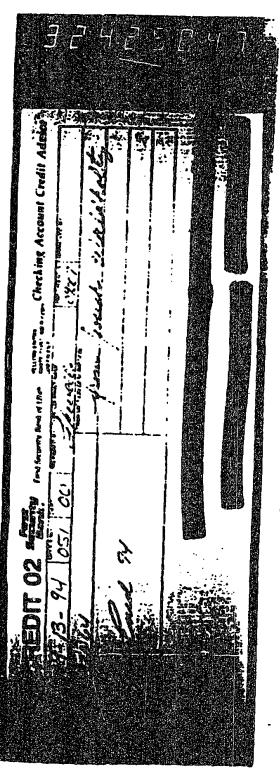


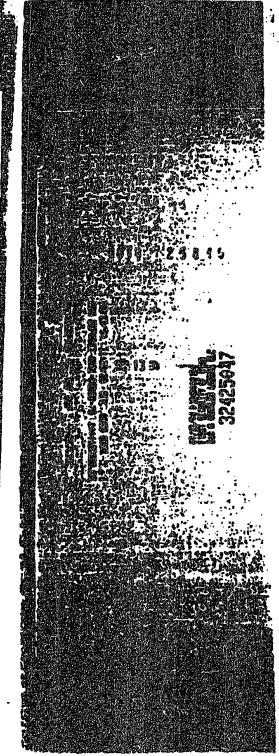




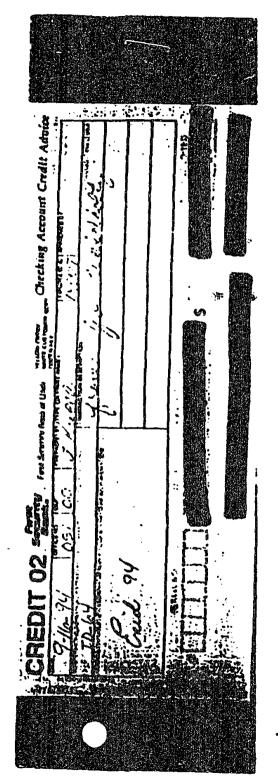


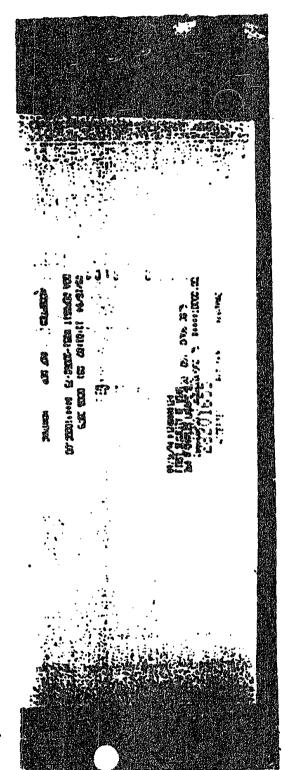




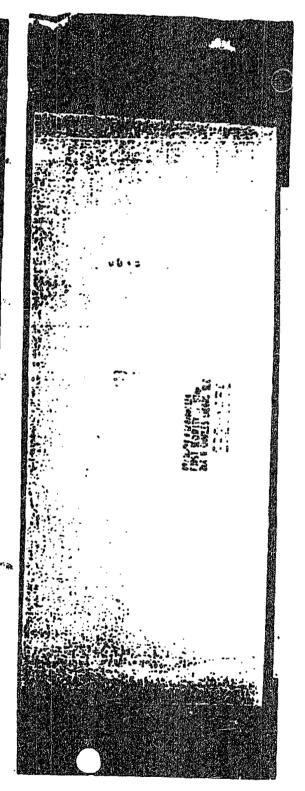


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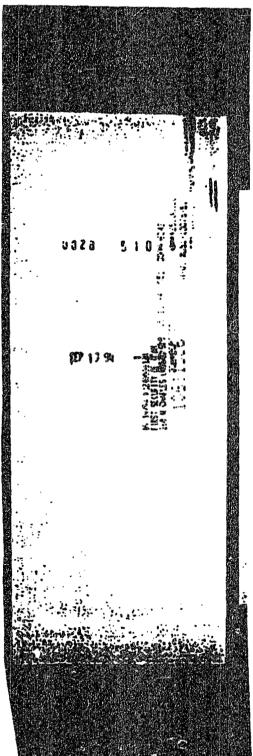
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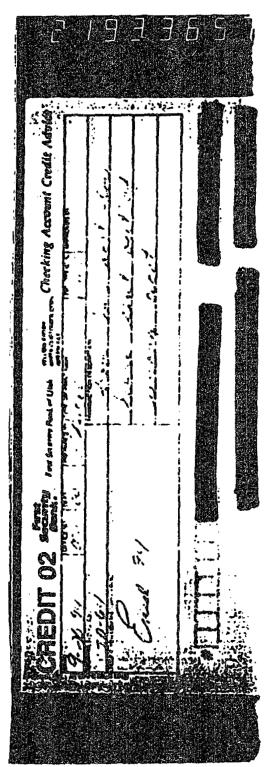


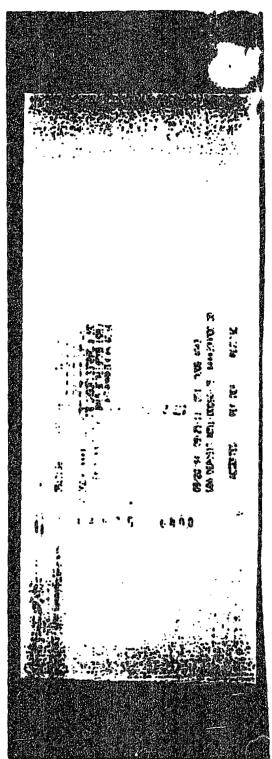
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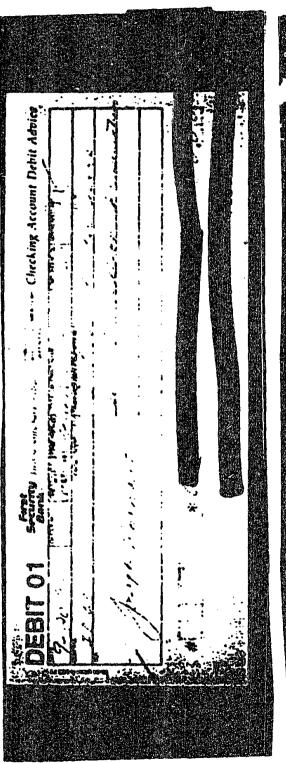
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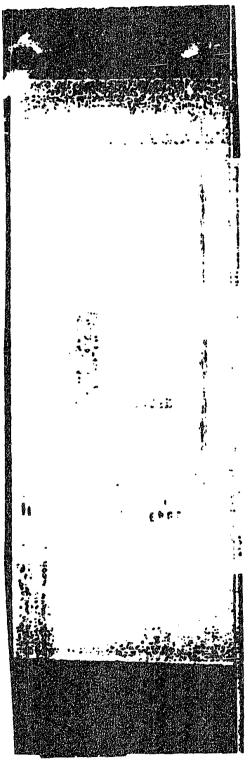
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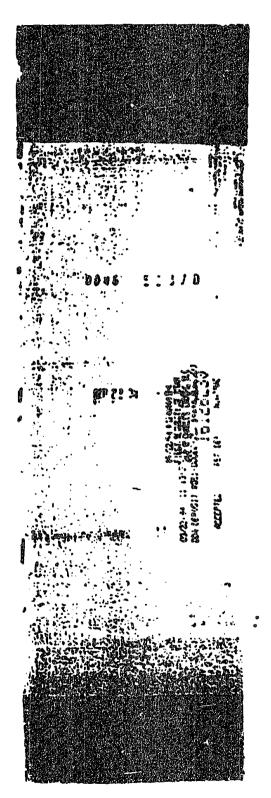
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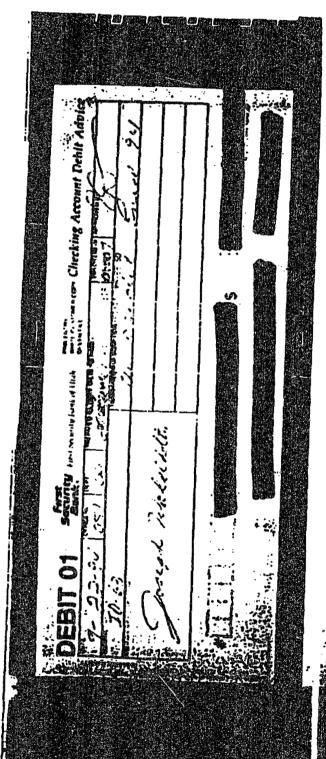
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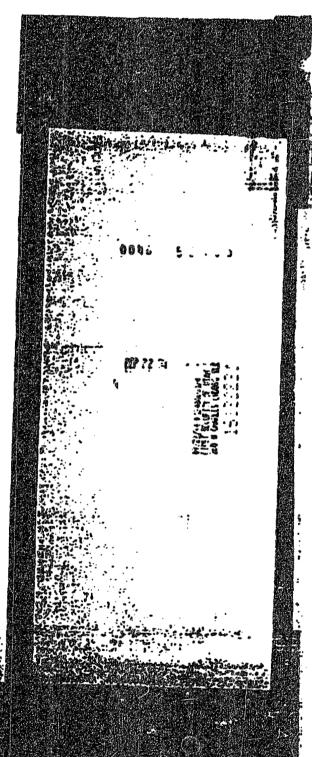
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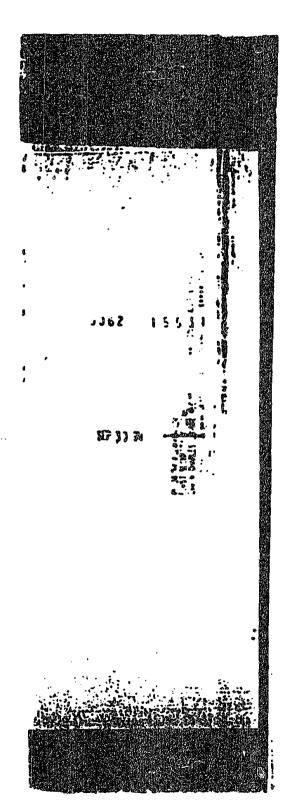
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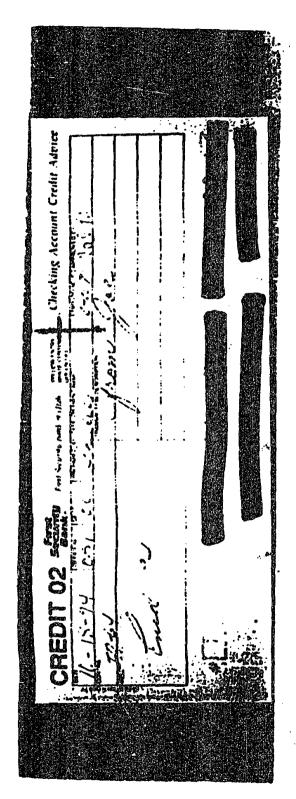


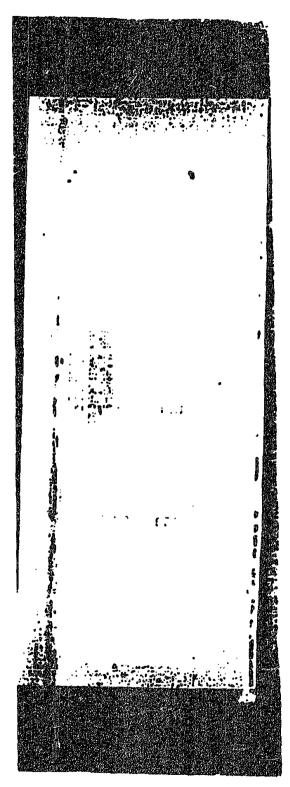


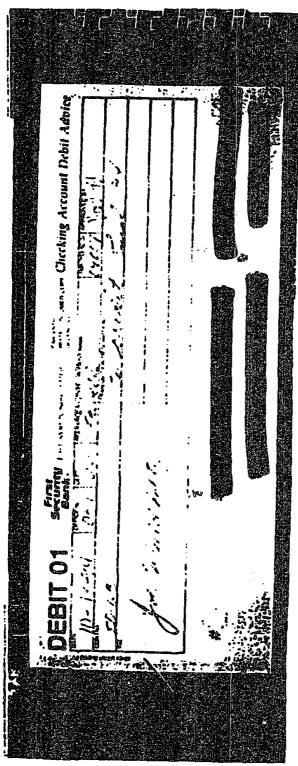
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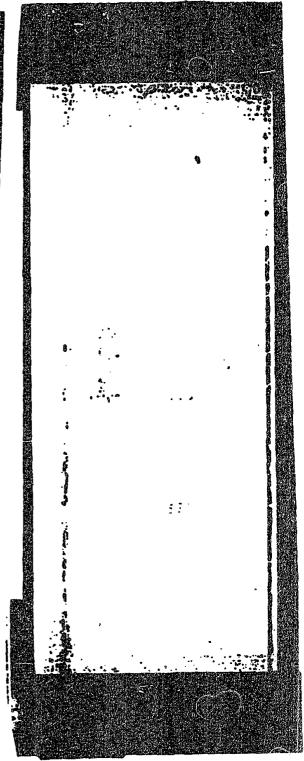


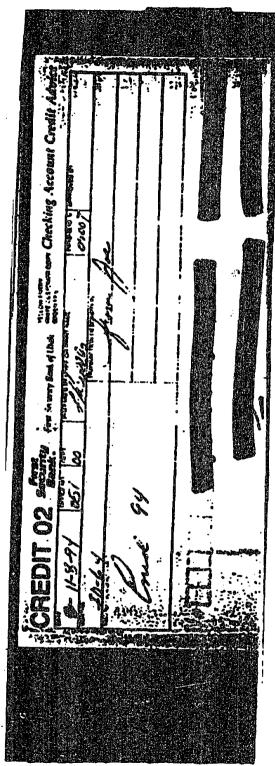
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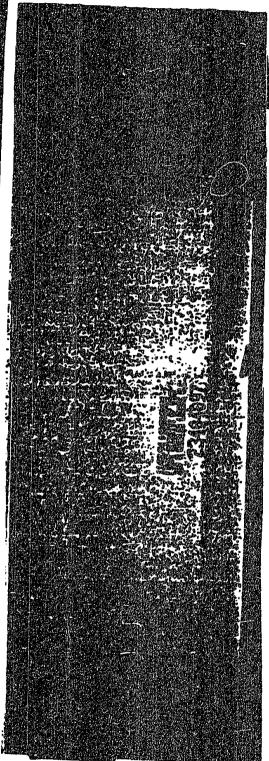


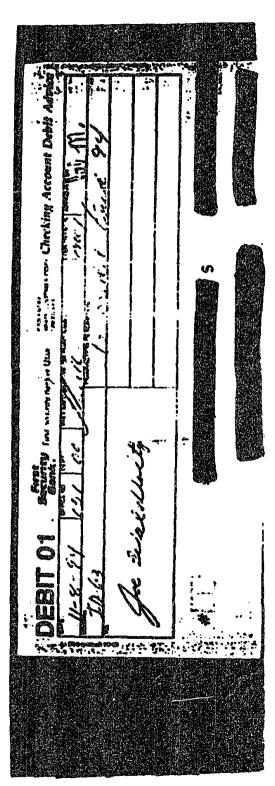


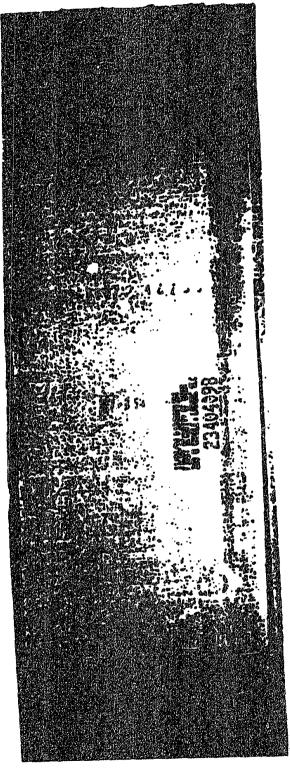


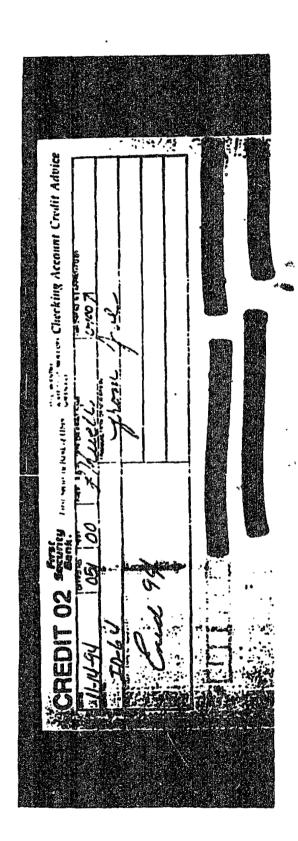


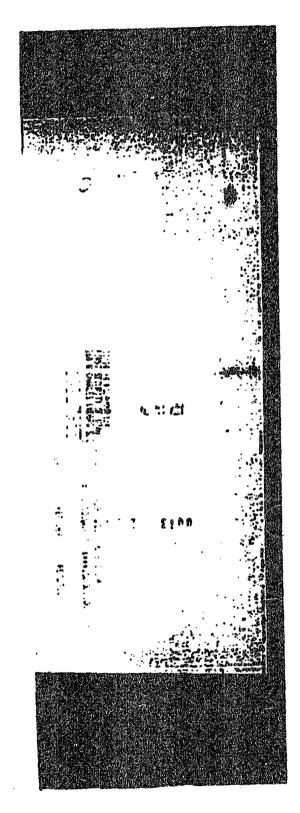


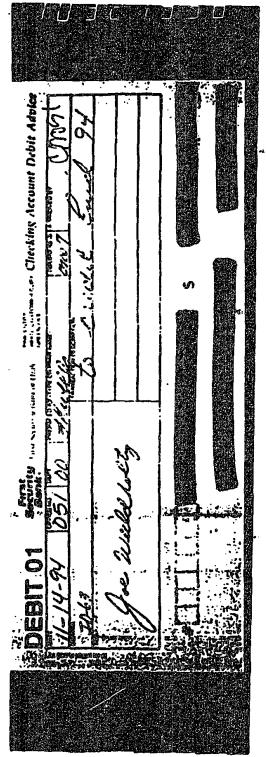


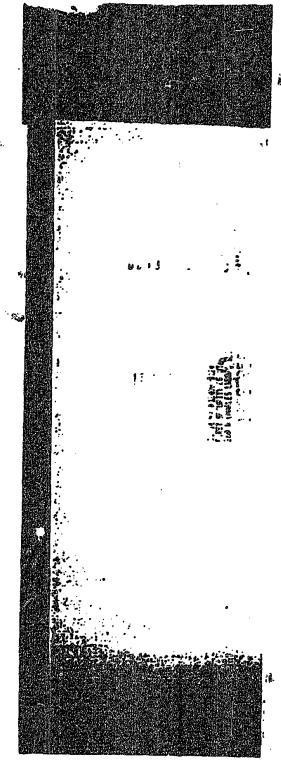












Contributions to ENID '94 and ENID '96 in 1994 and 1995 in Excess of \$1000 - On Information and Belief, Made by Joseph Waldholtz and Not Reported to the FEC

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Contributions to ENID '94 and ENID '96 in 1994 and 1995 in Excess of \$1000 - On Information and Belief, Made by Joseph Waldholtz and Not Reported to the FEC

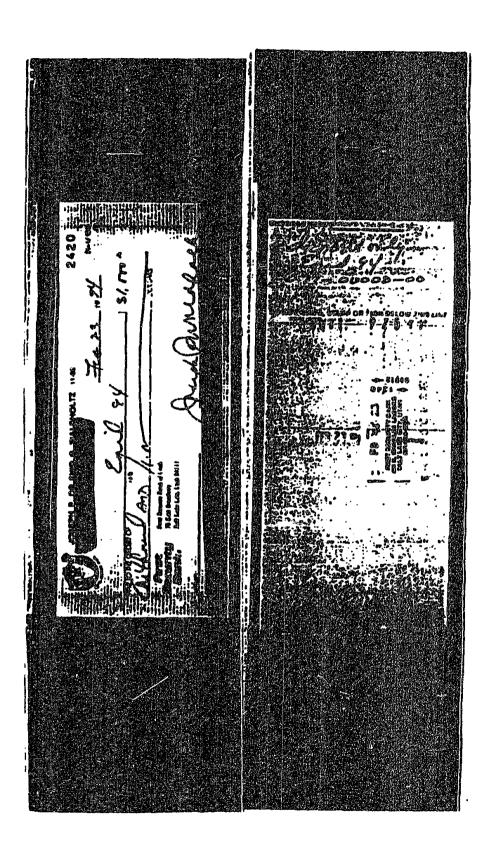
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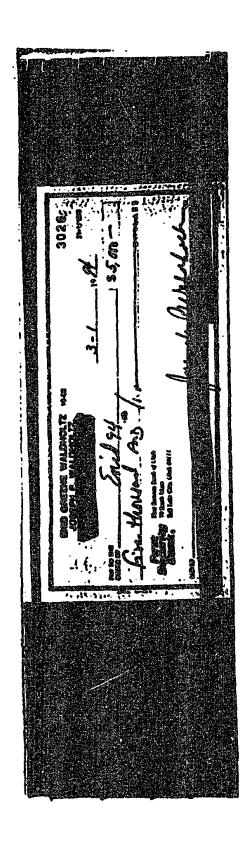
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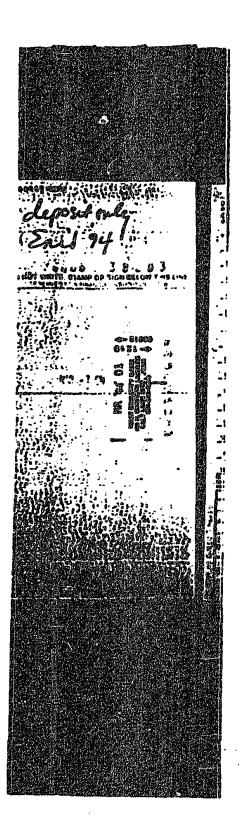
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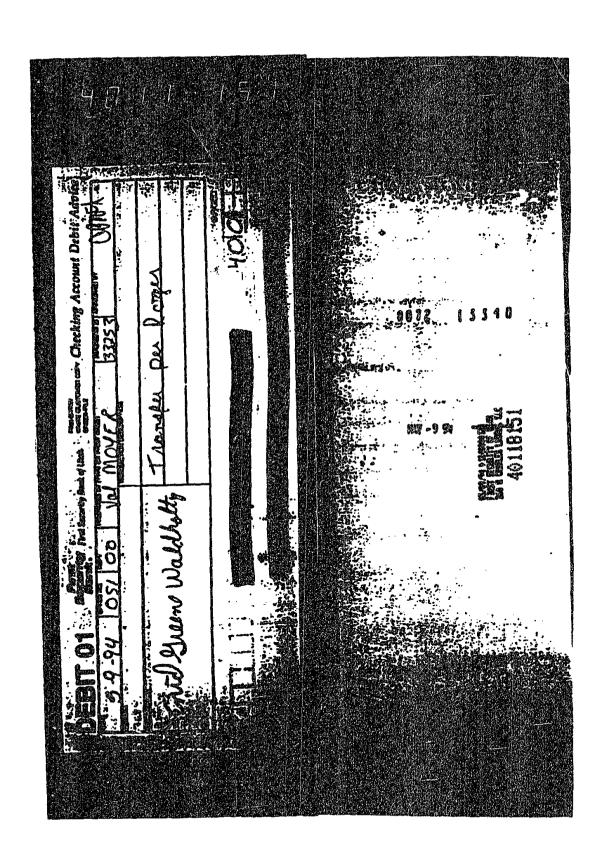
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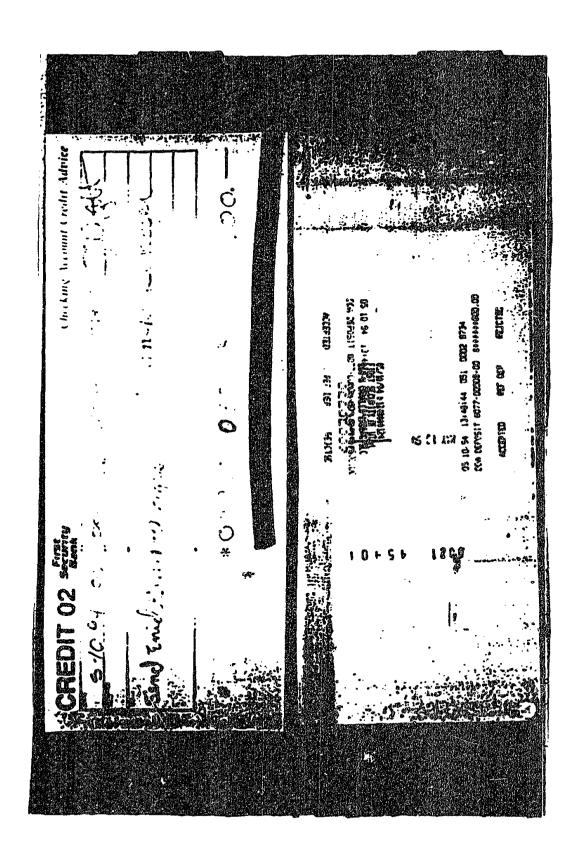




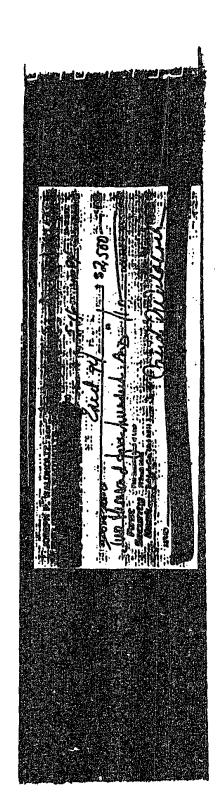


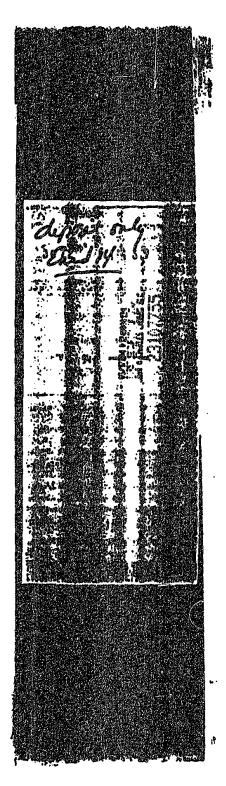


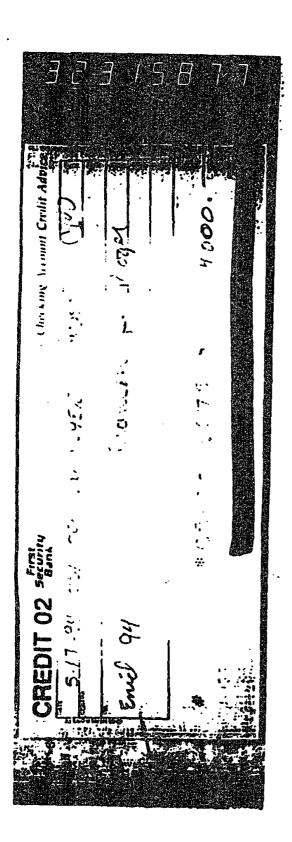
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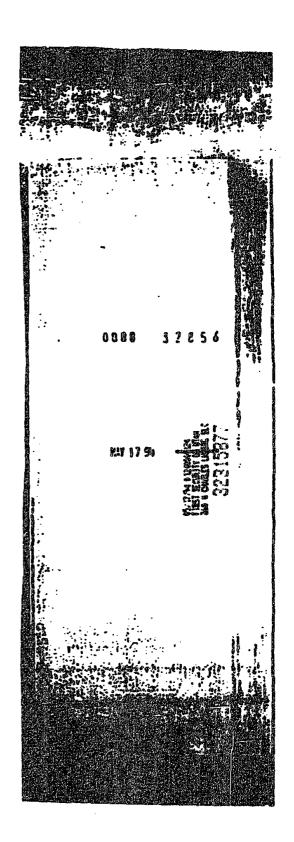


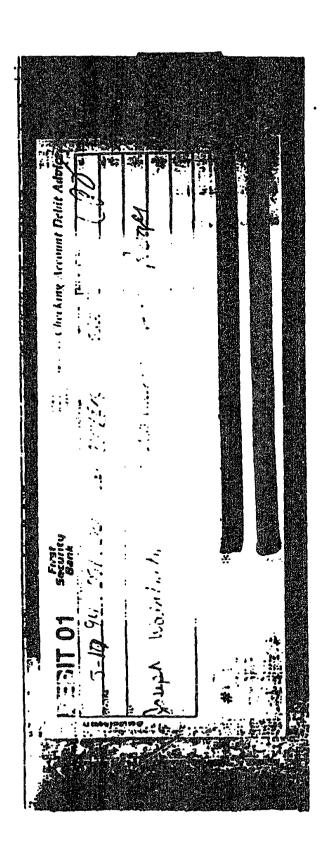
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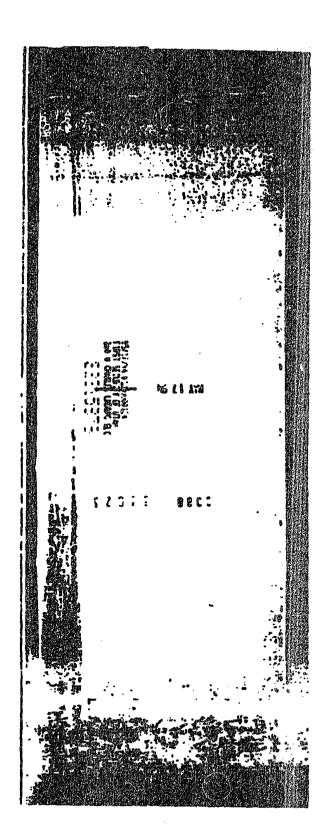


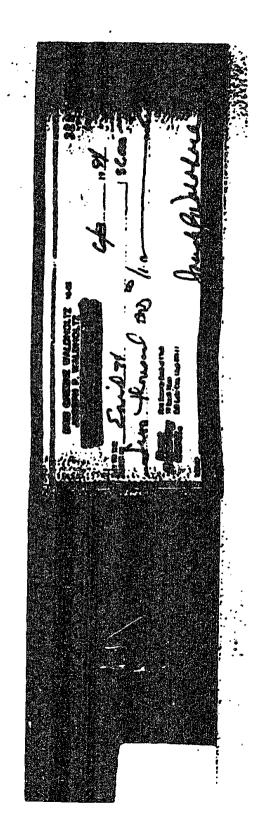


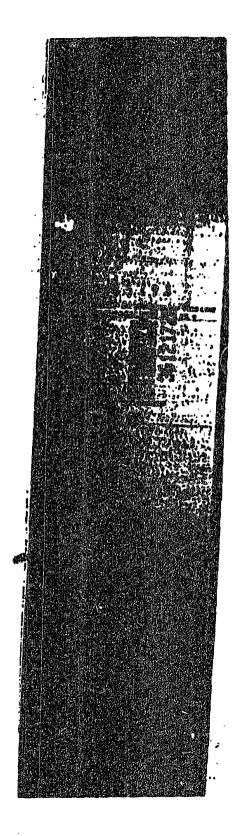


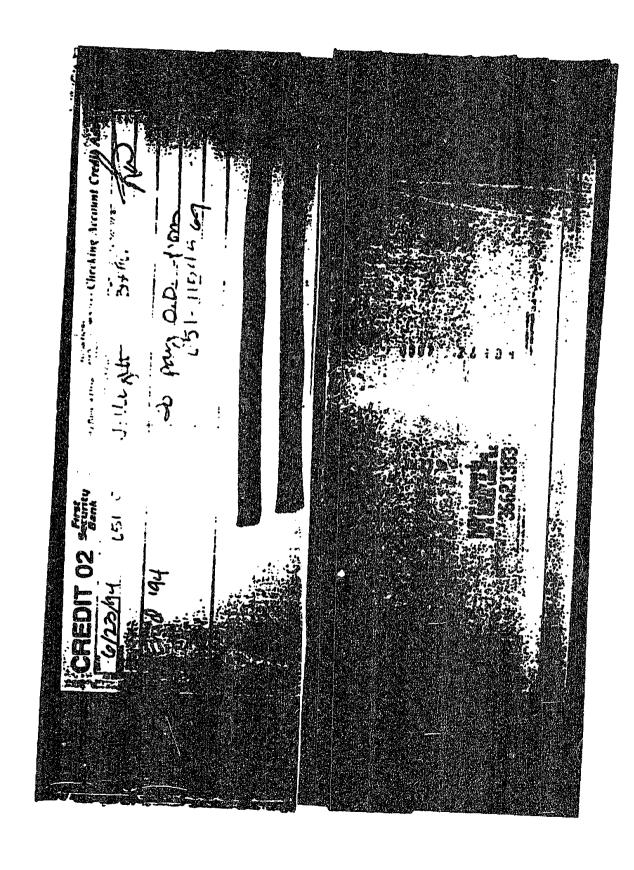


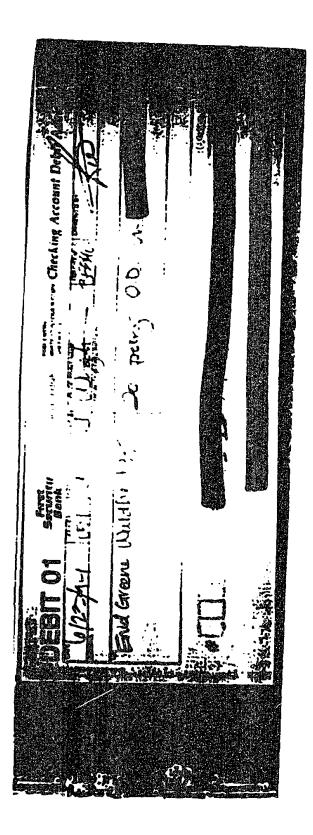


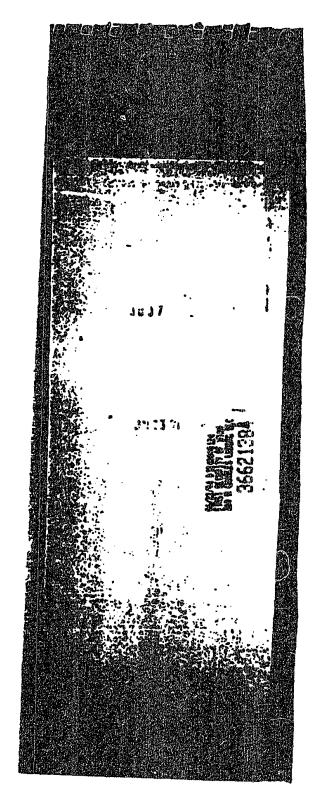


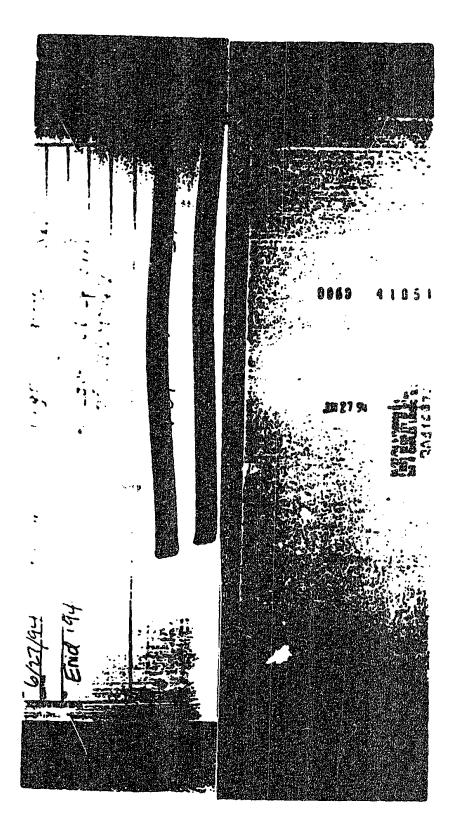


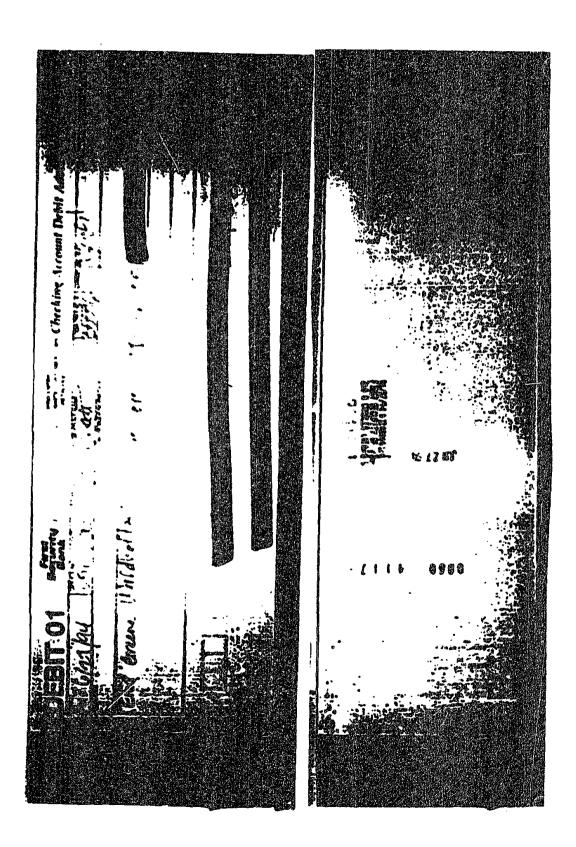




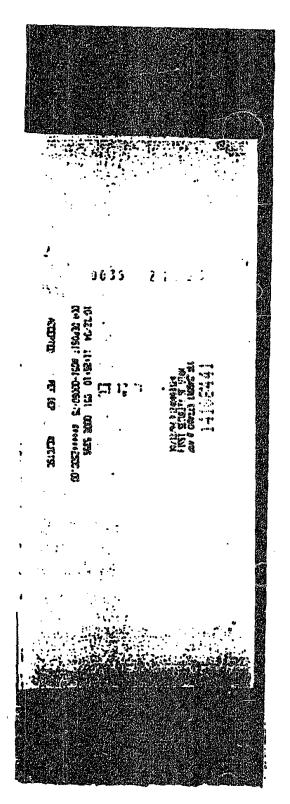


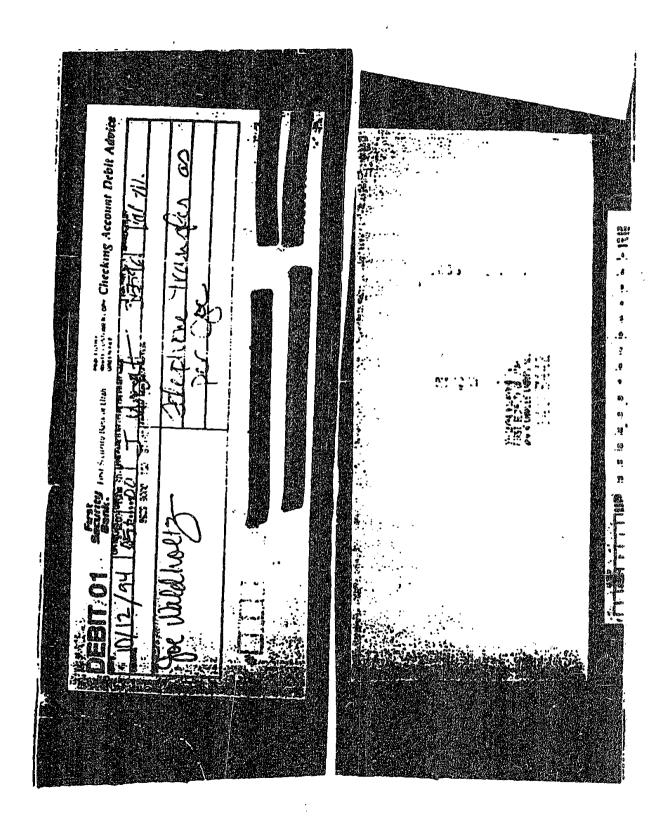


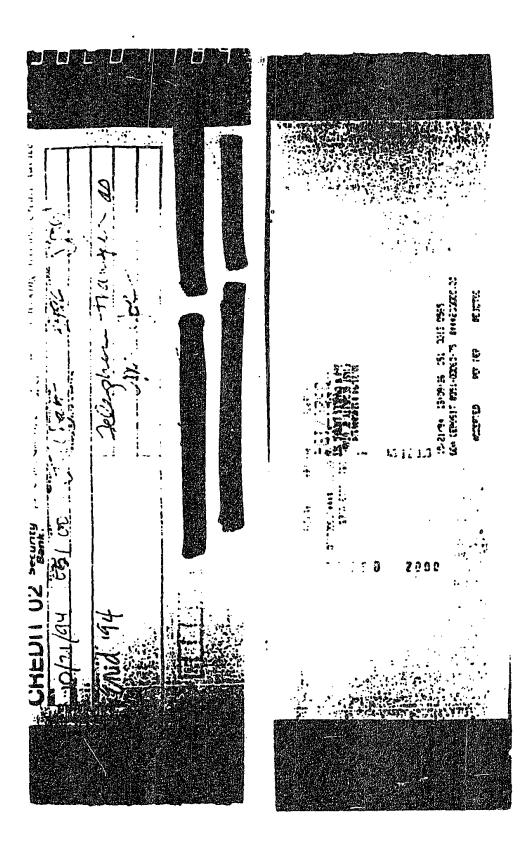




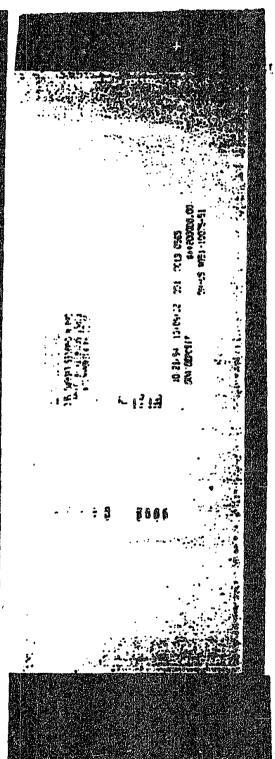
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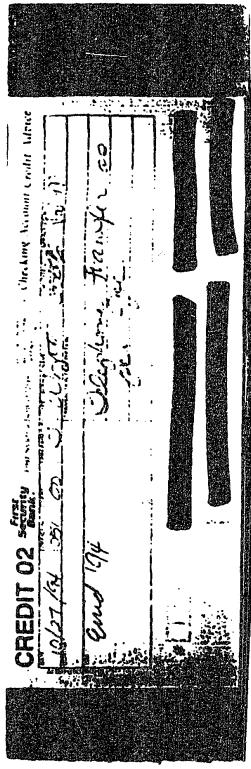


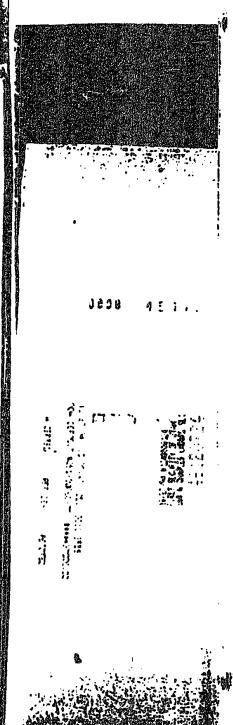


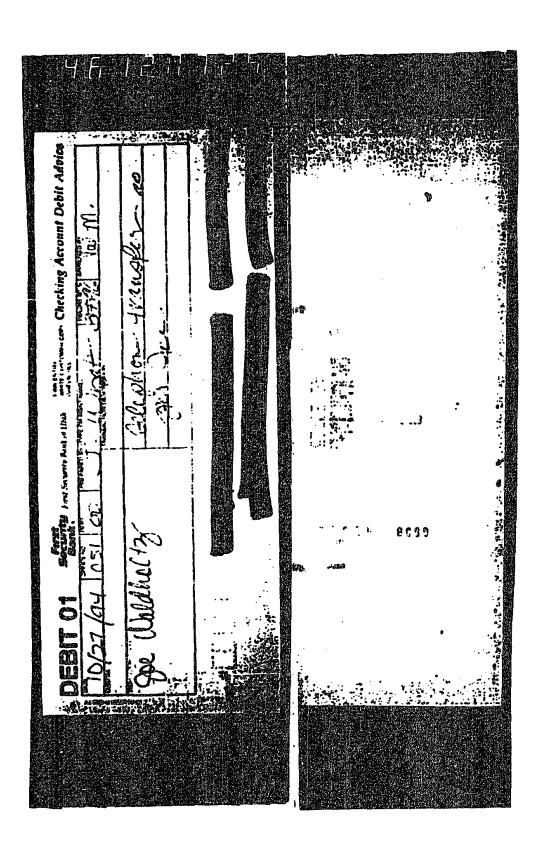


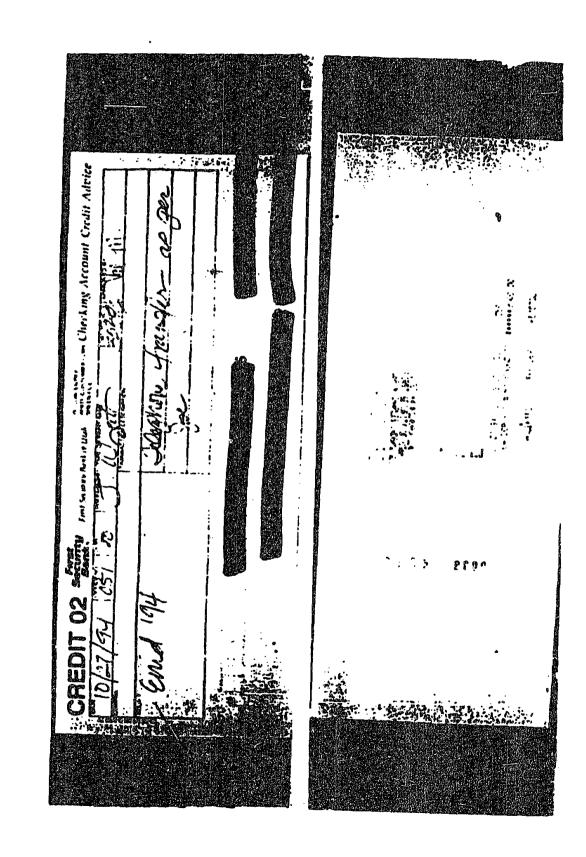
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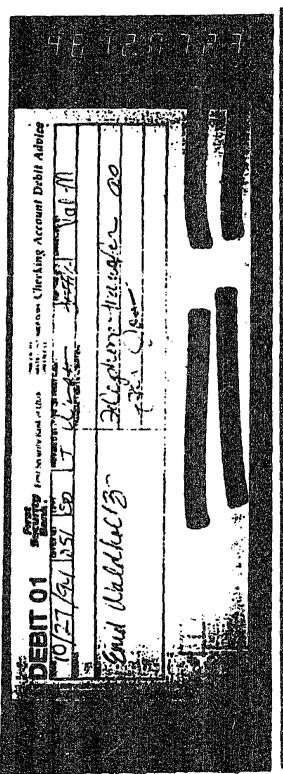


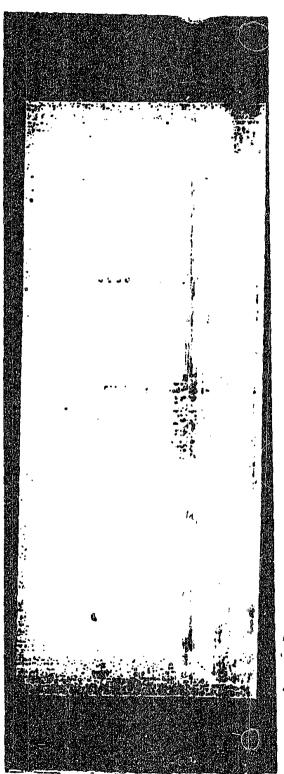


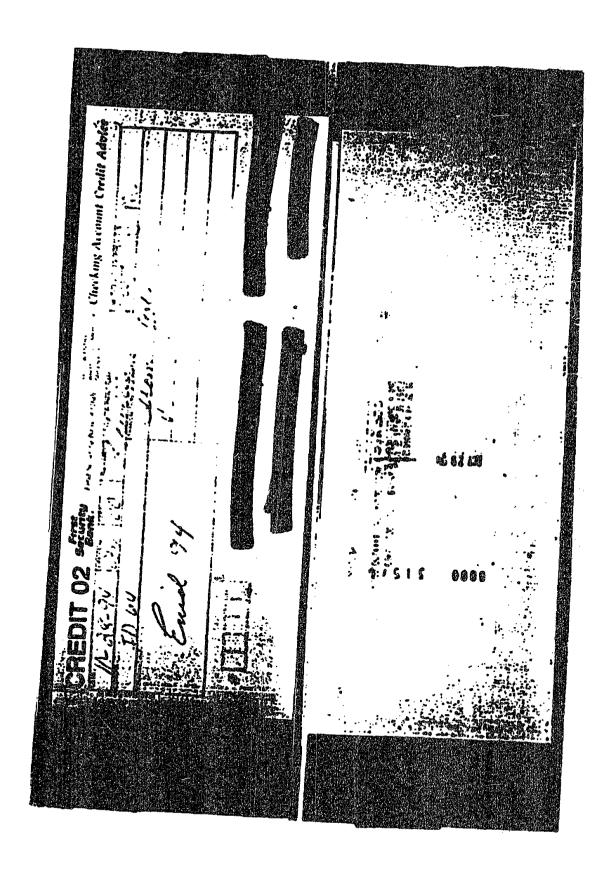






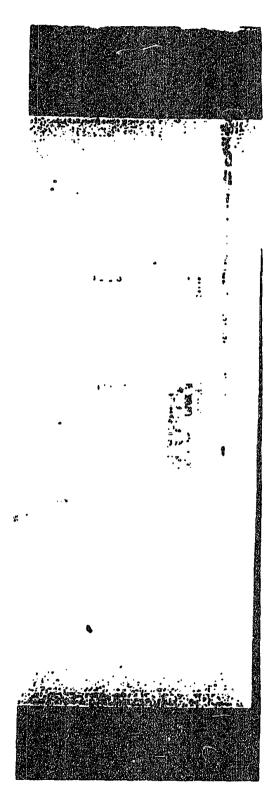


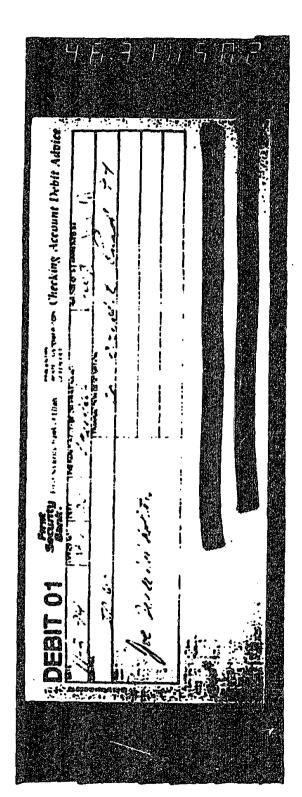


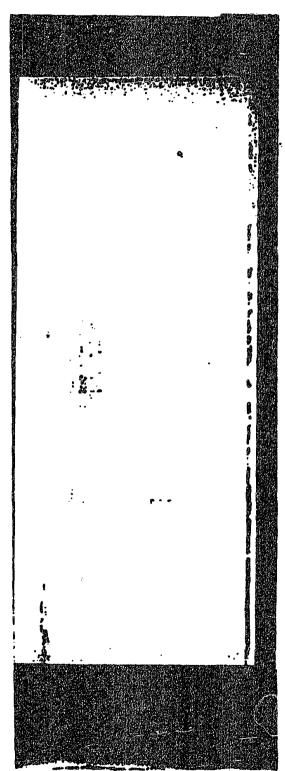


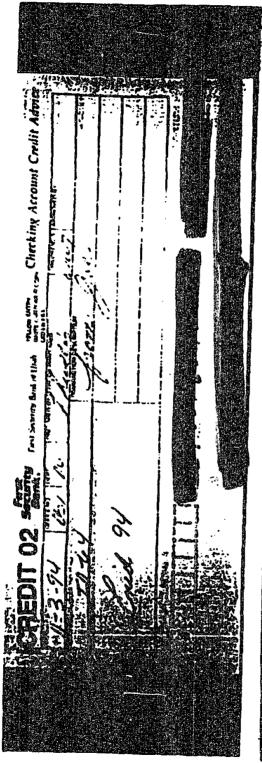
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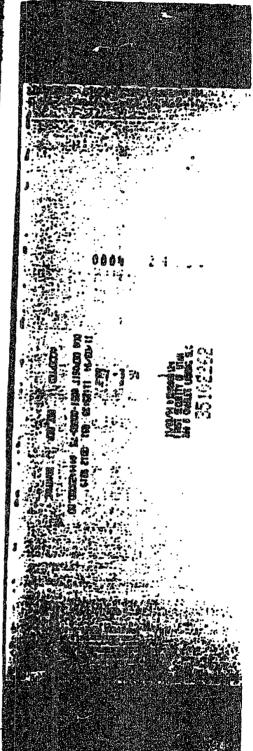
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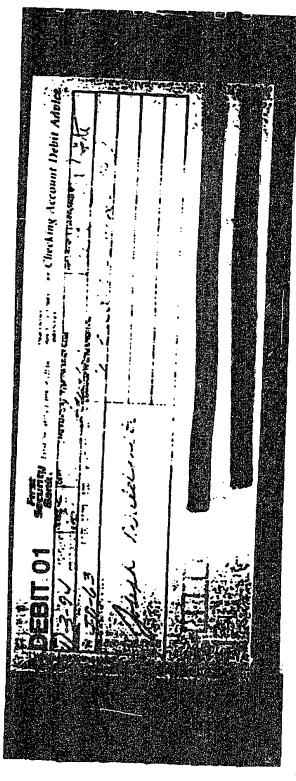


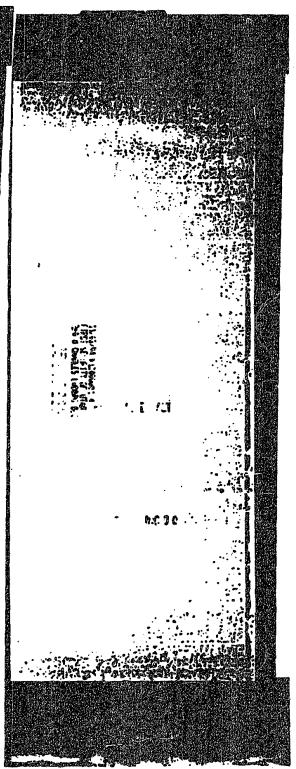


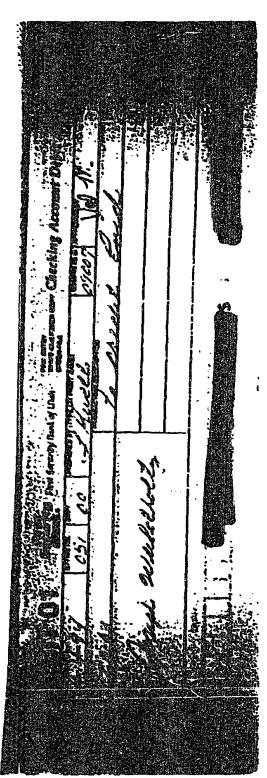


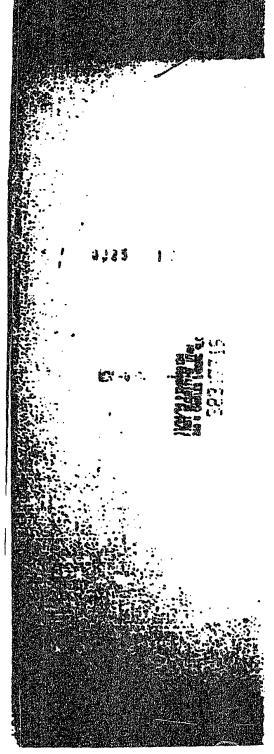




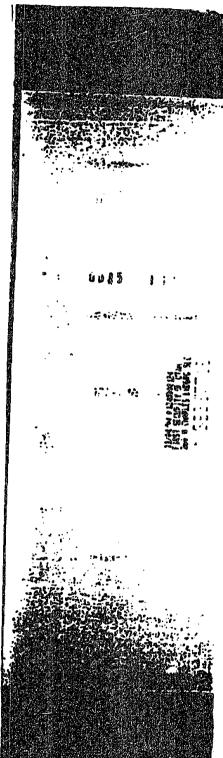


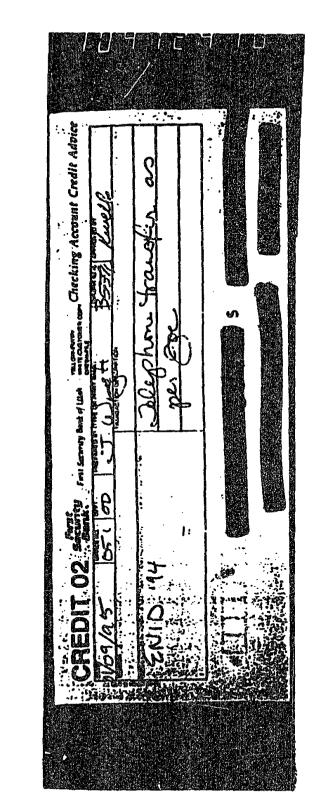


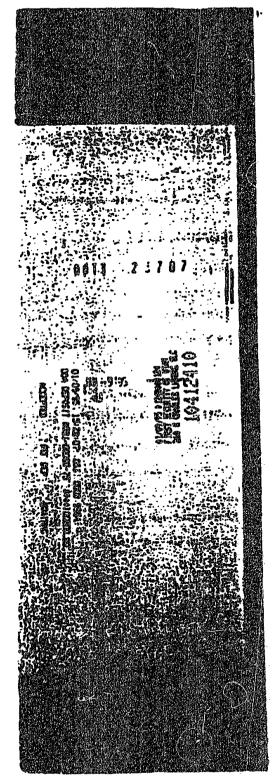


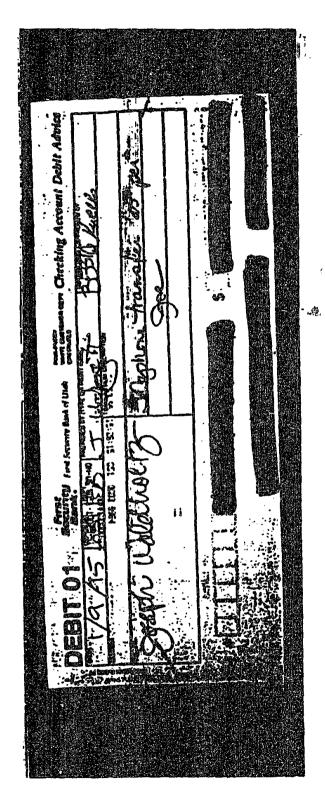


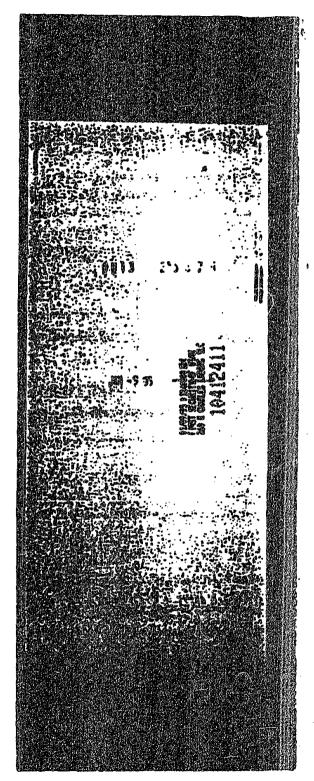


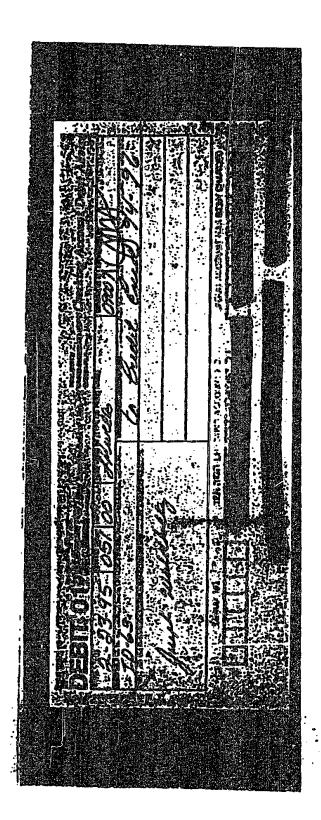


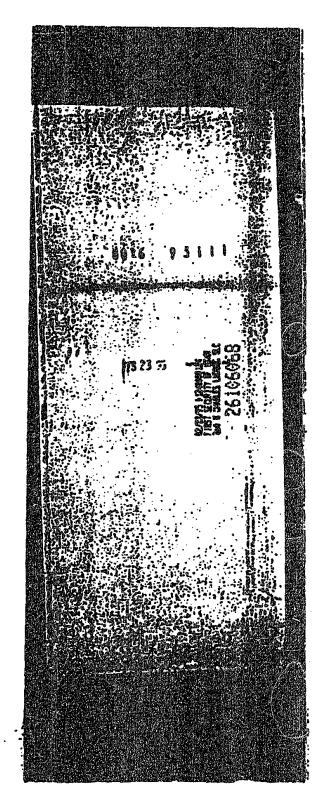


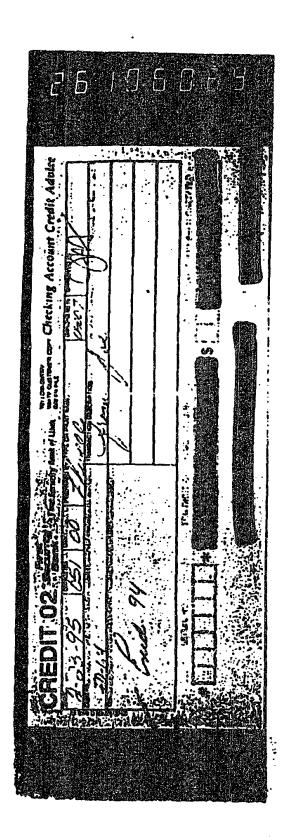


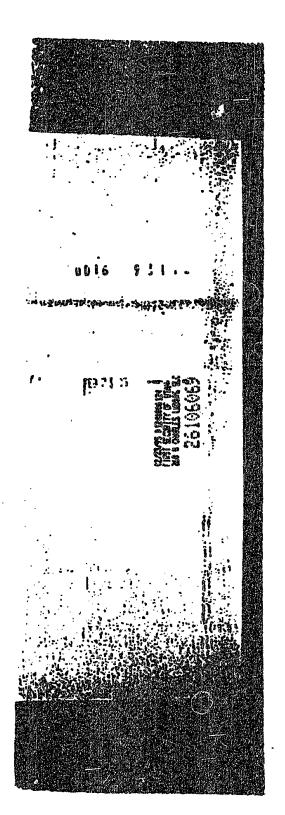


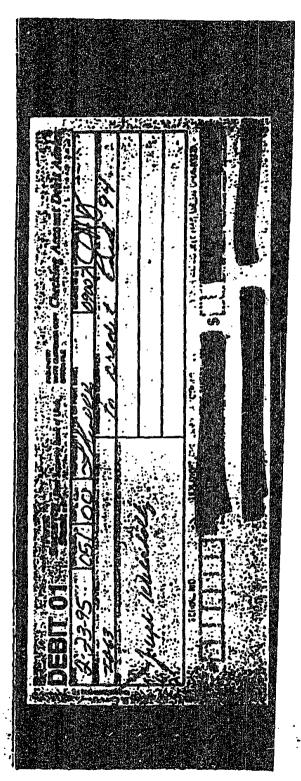


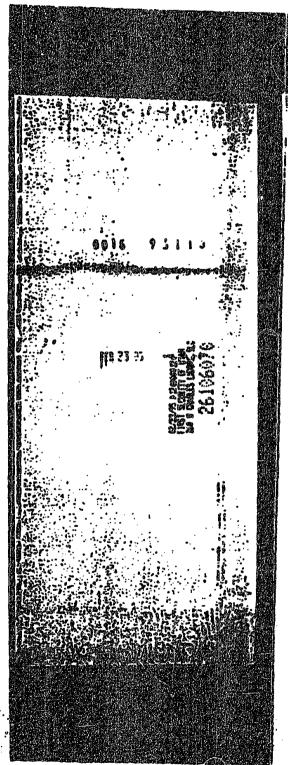


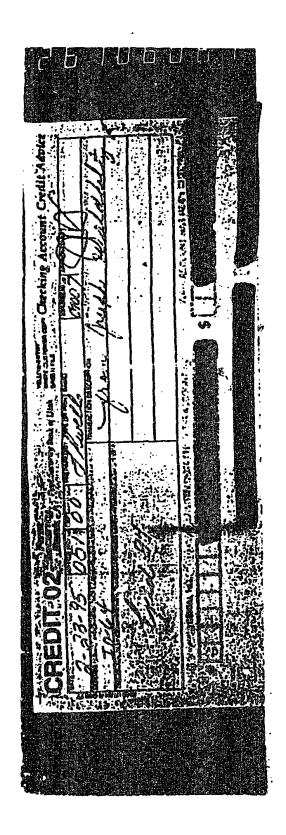


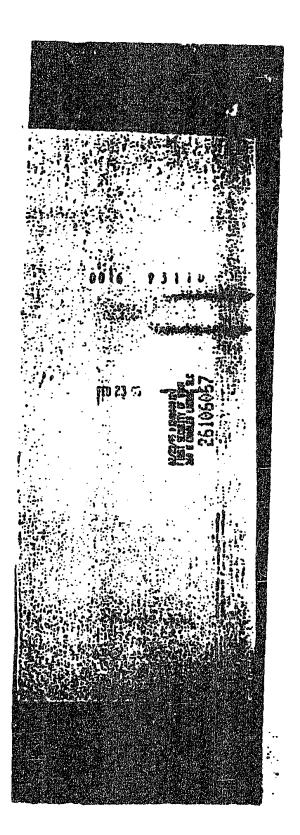


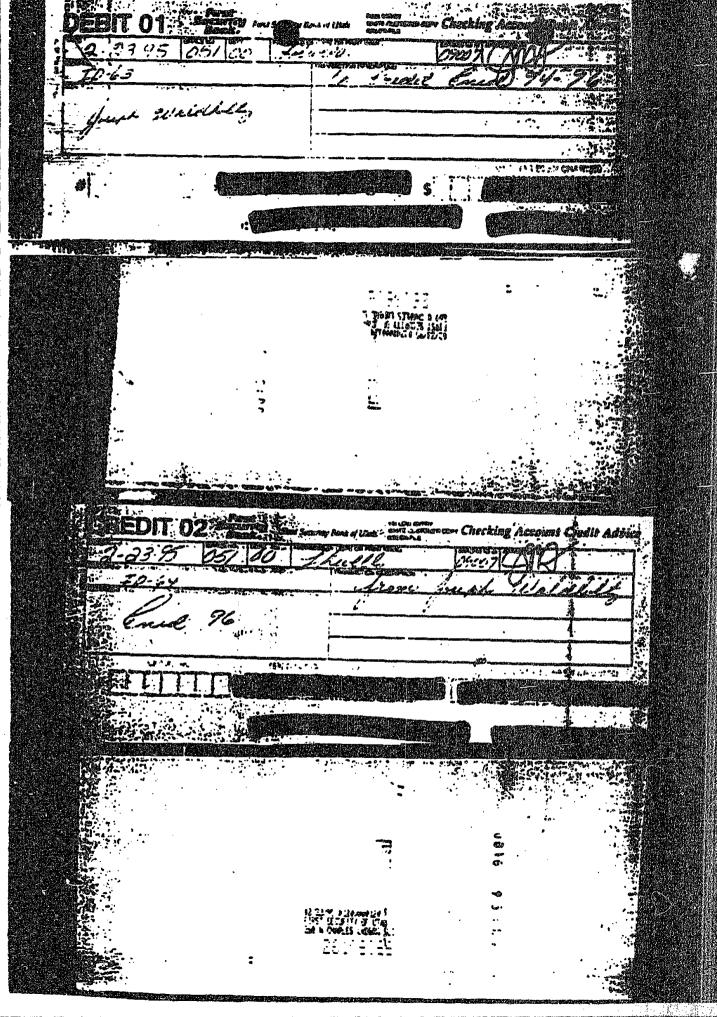


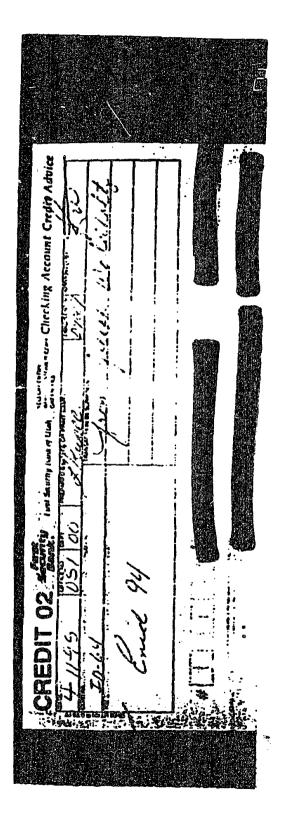


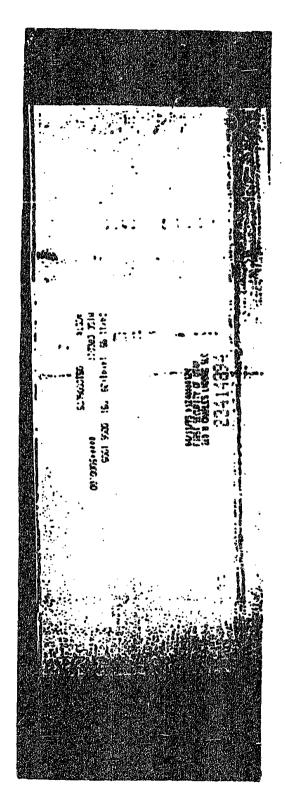




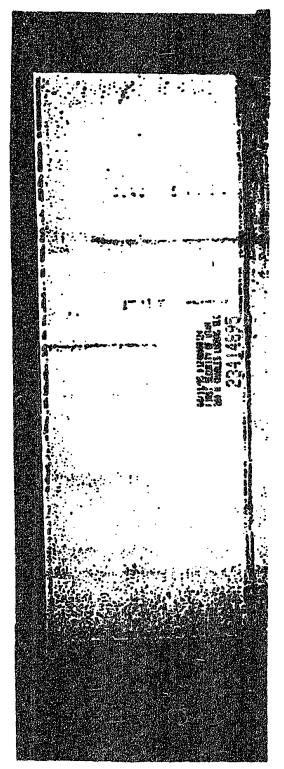


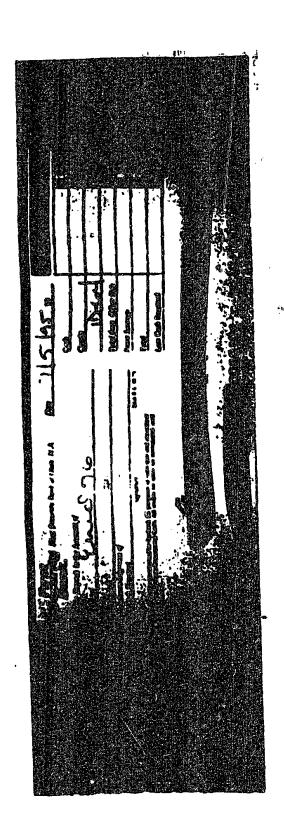


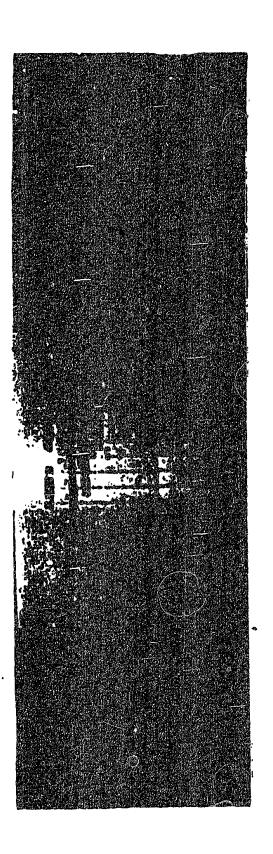


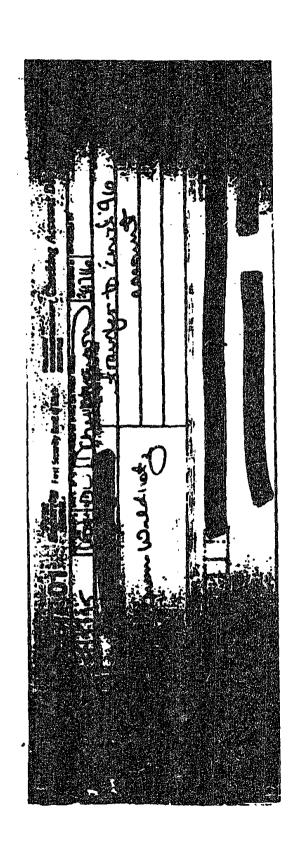


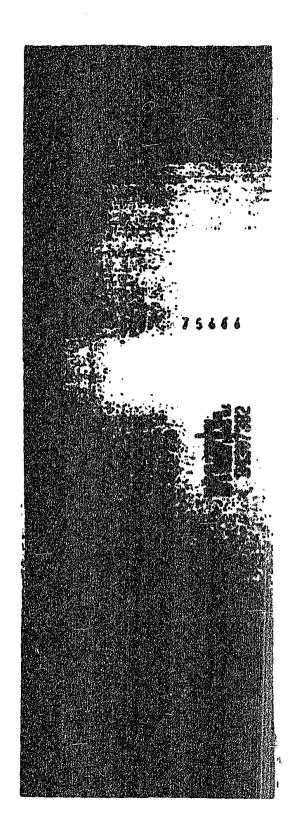
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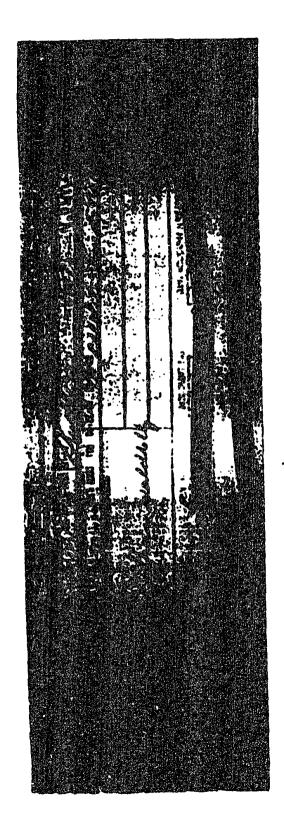


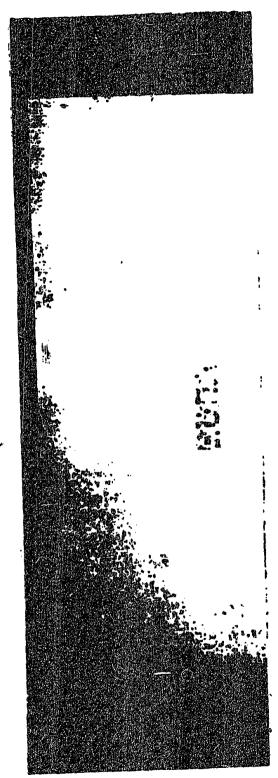


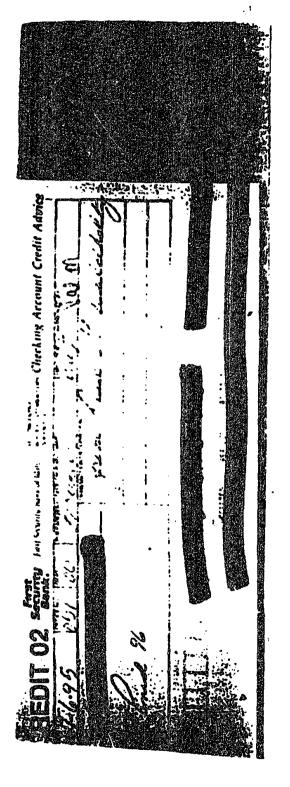


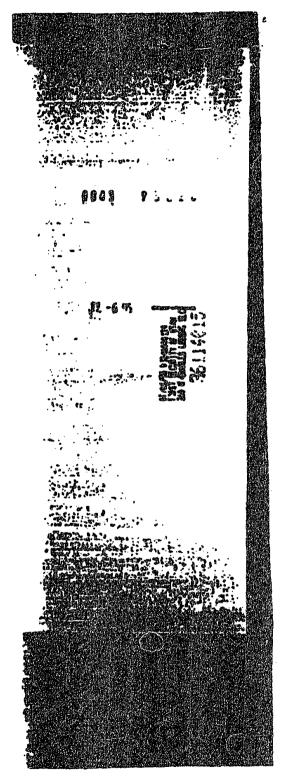


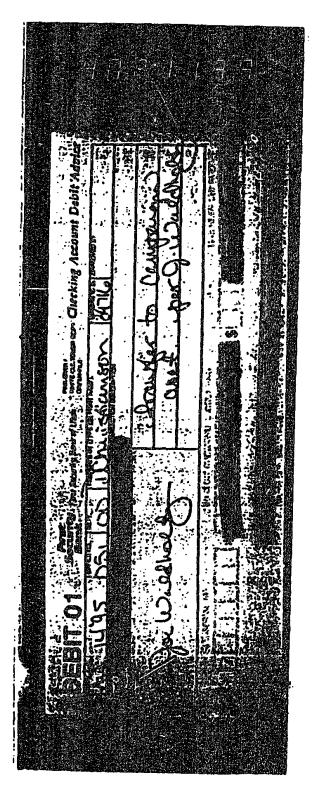


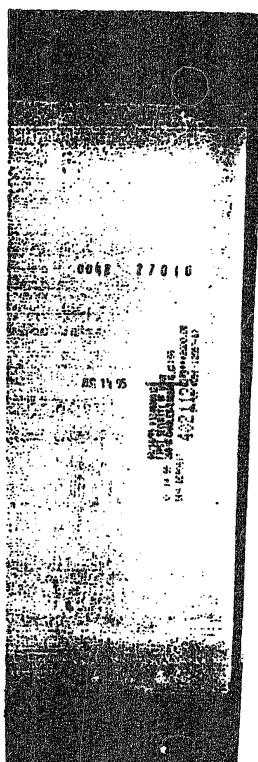




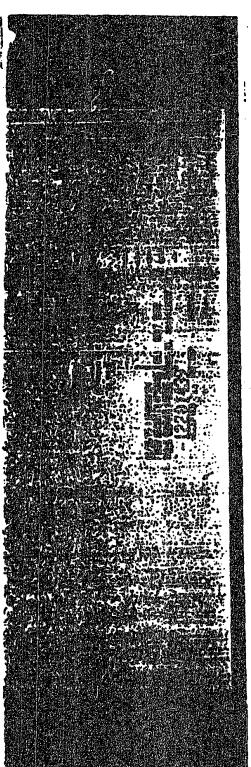




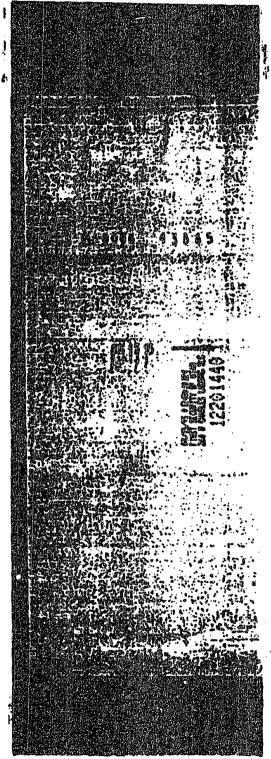


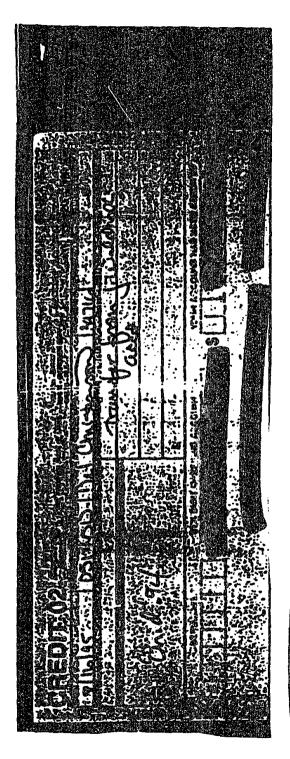


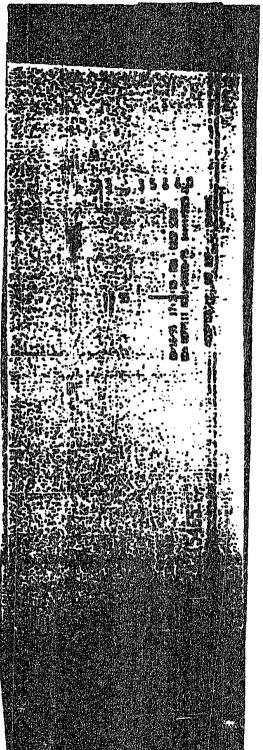


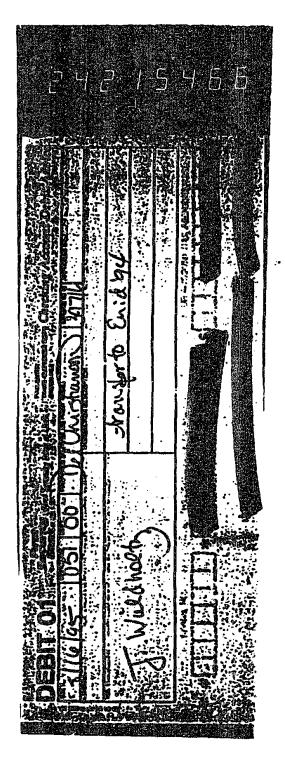


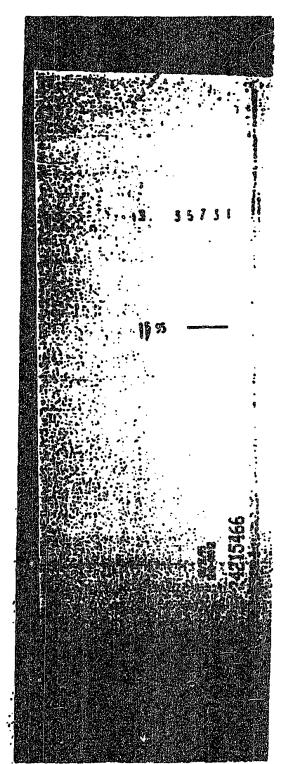


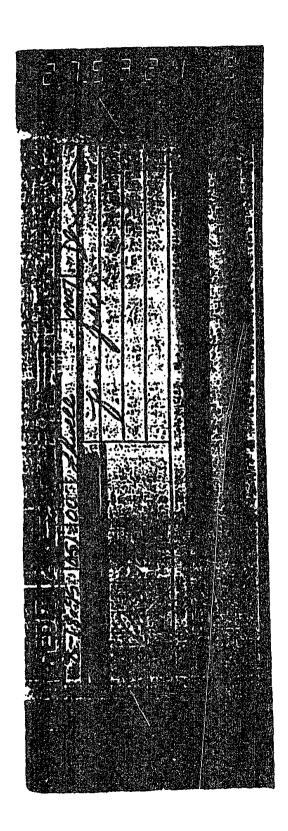


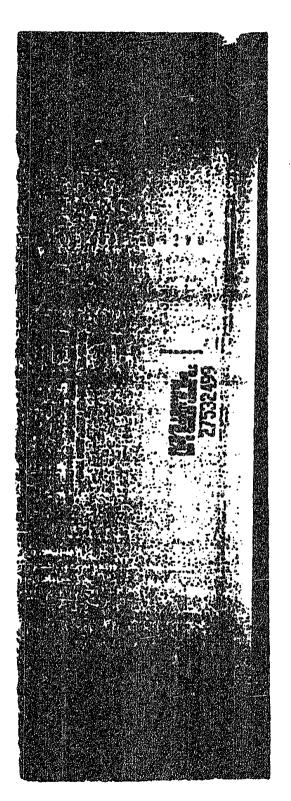


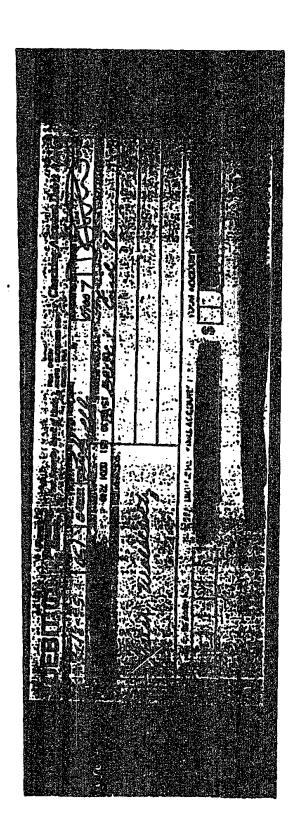


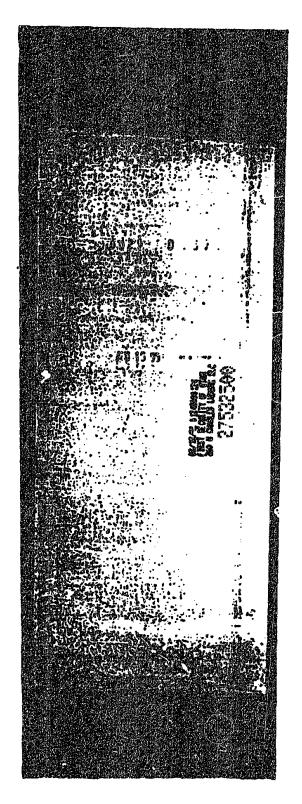


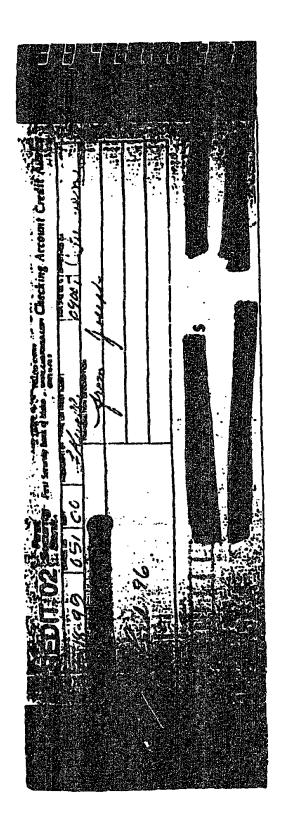


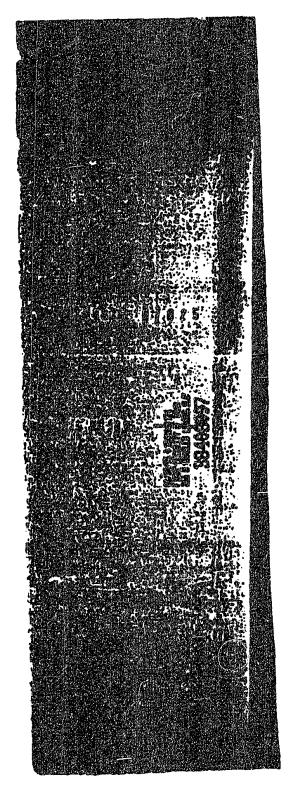


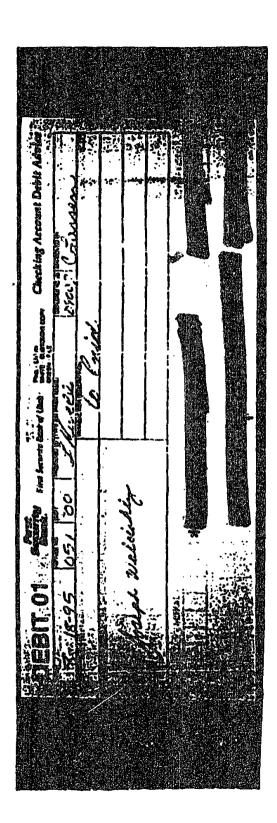


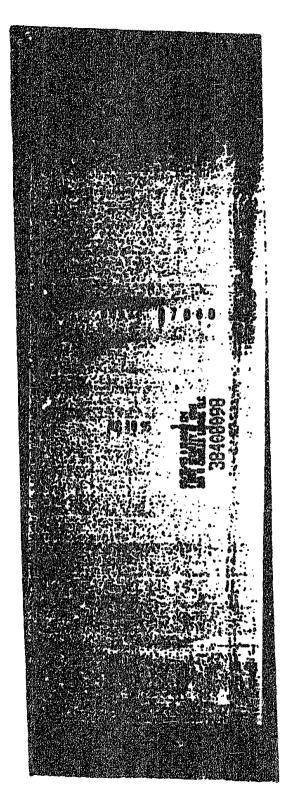


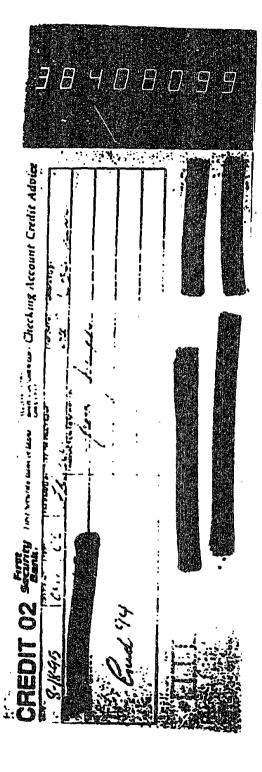


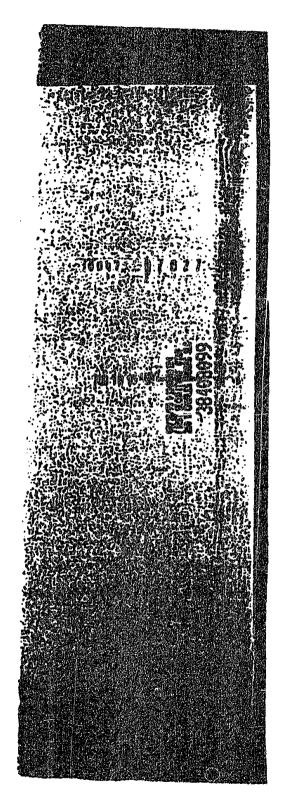


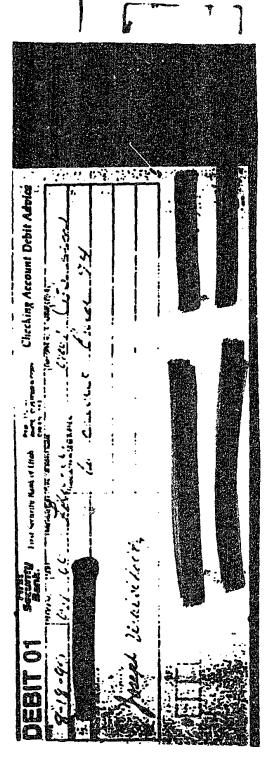


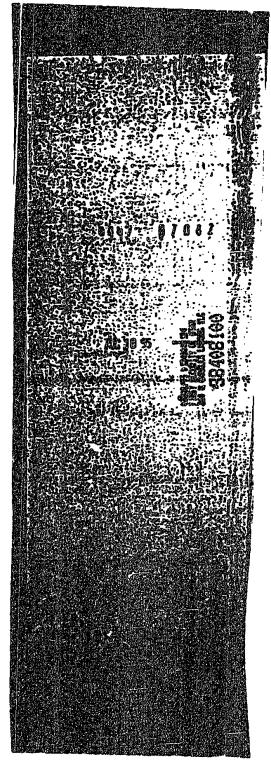


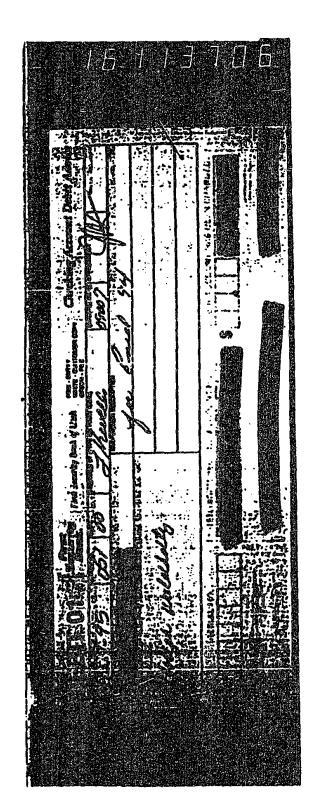


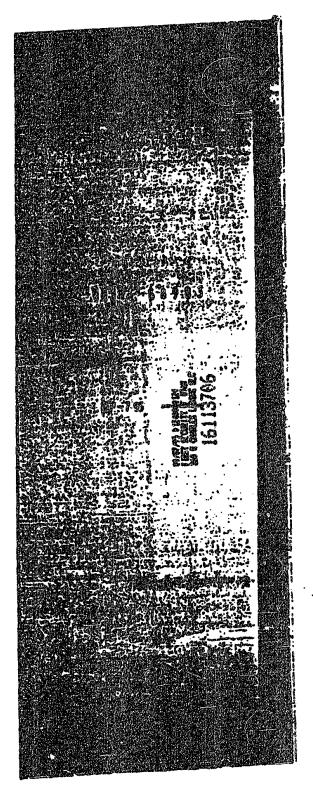


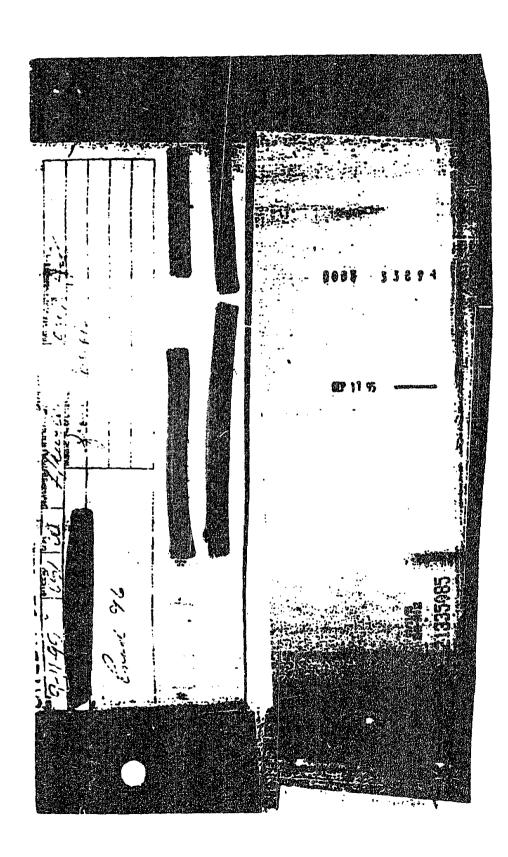


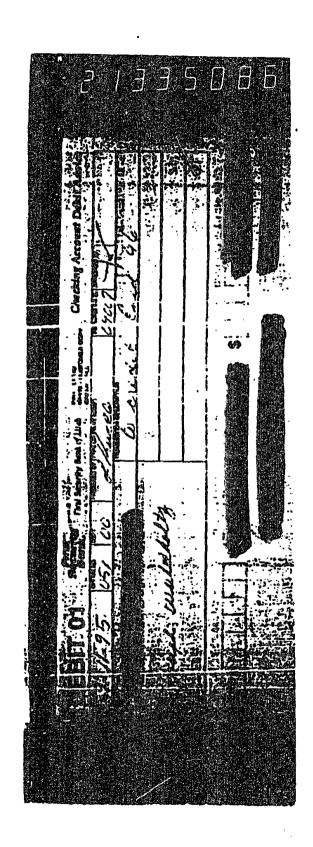


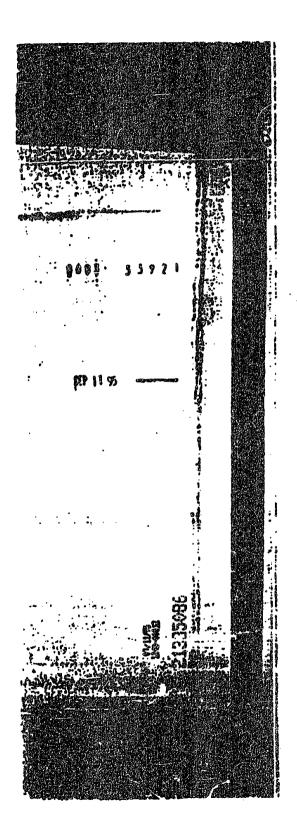


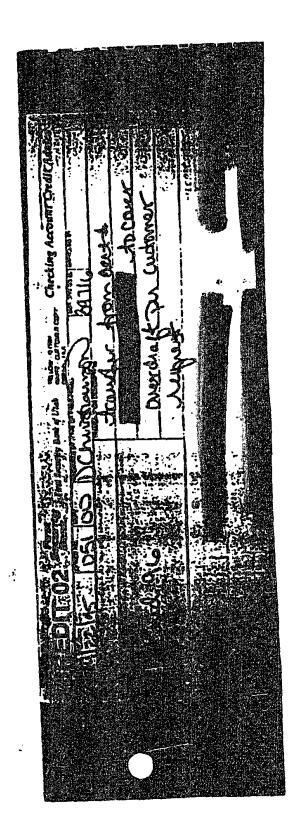


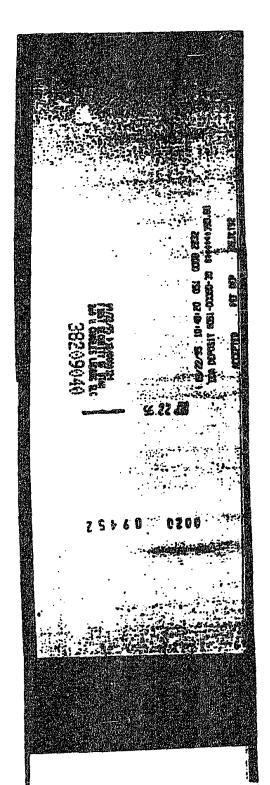


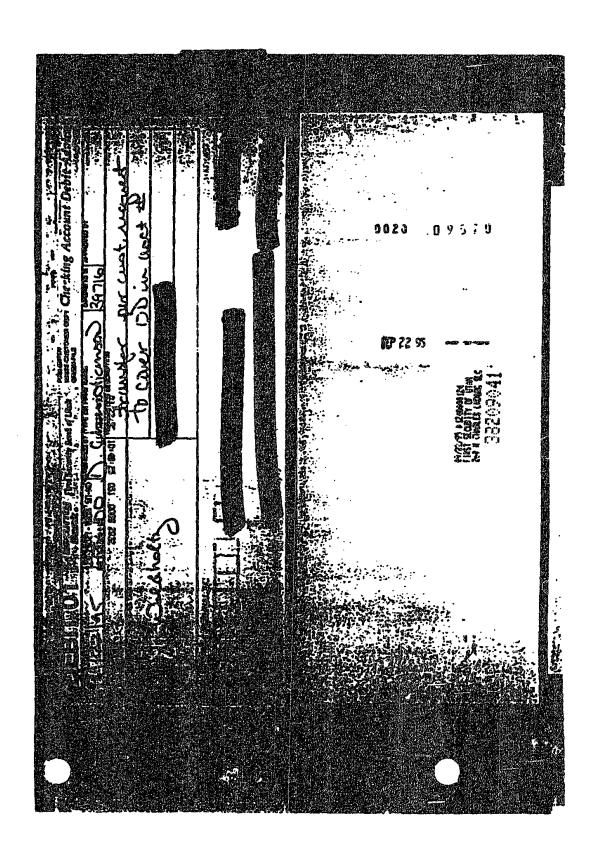


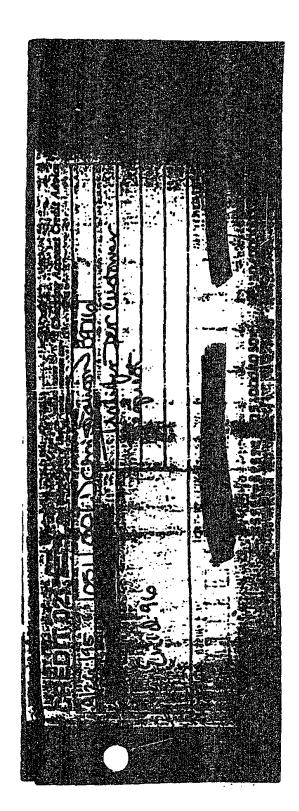


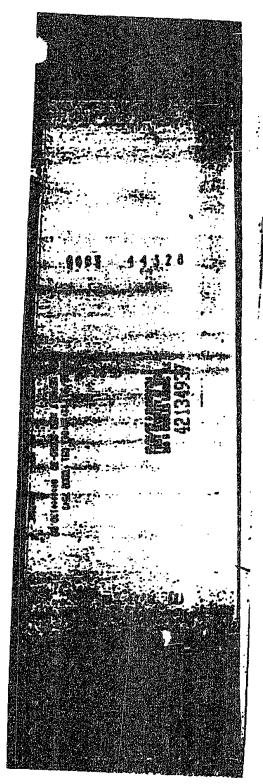


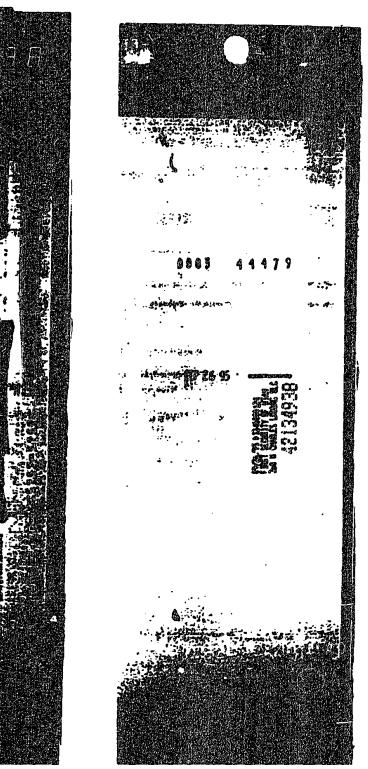


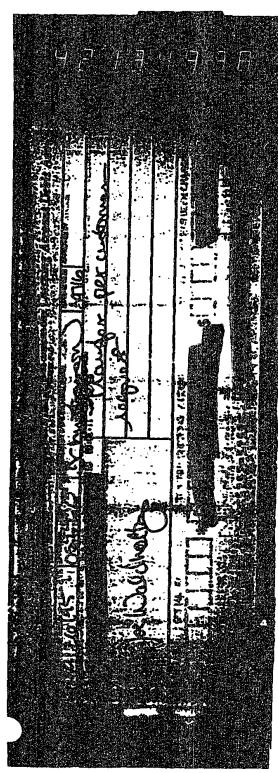




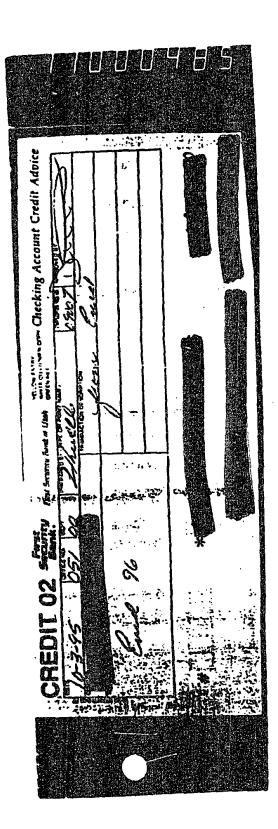


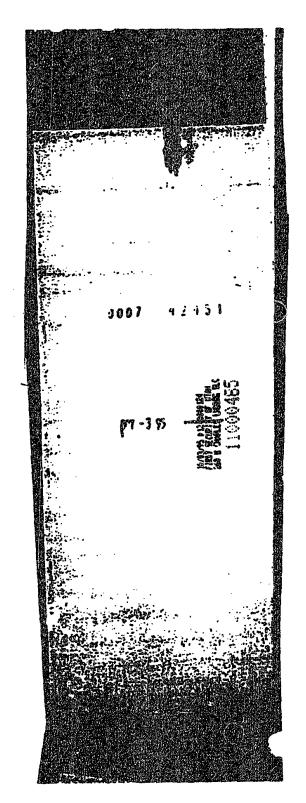


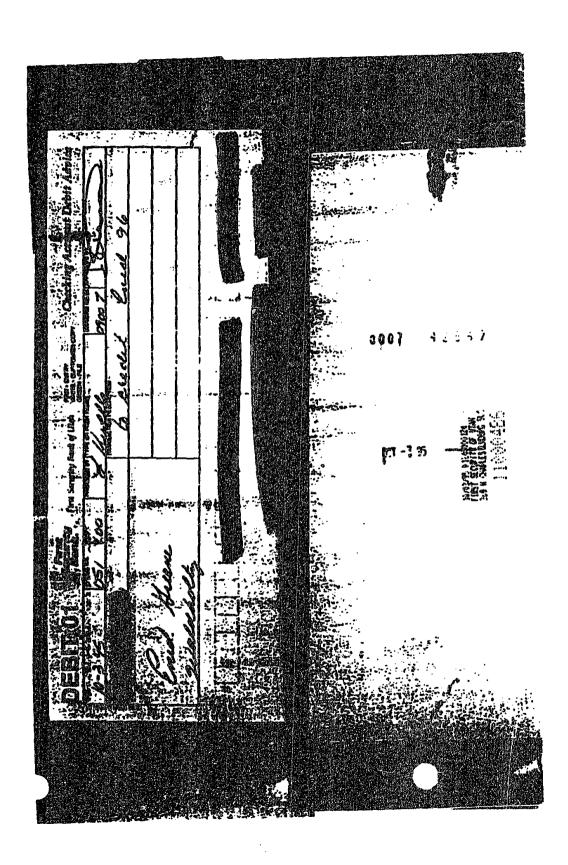


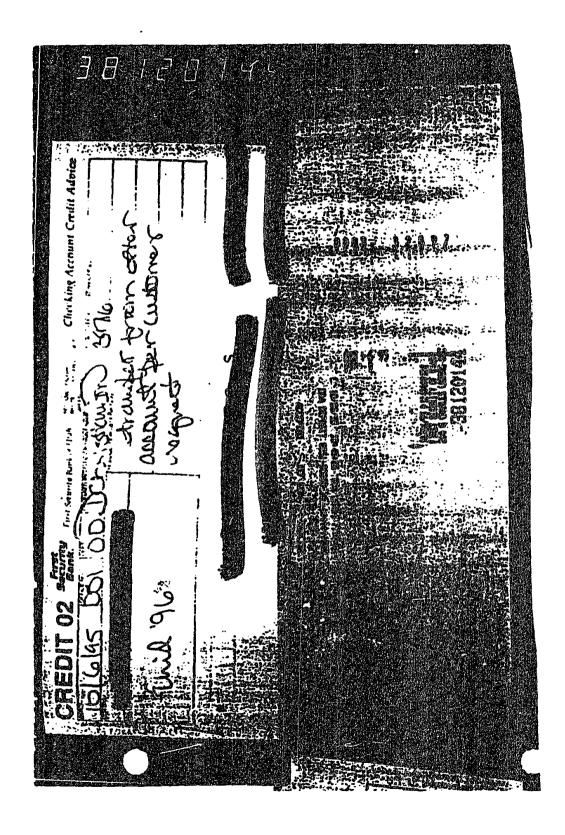


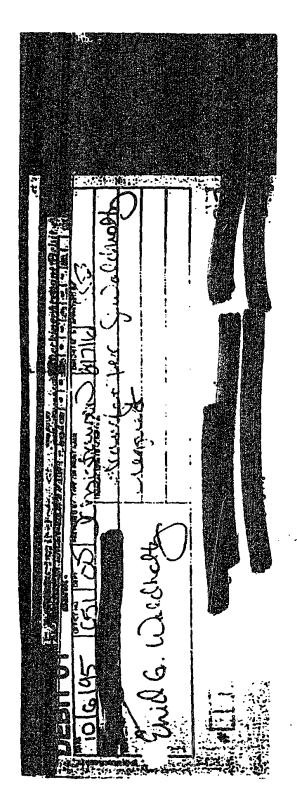
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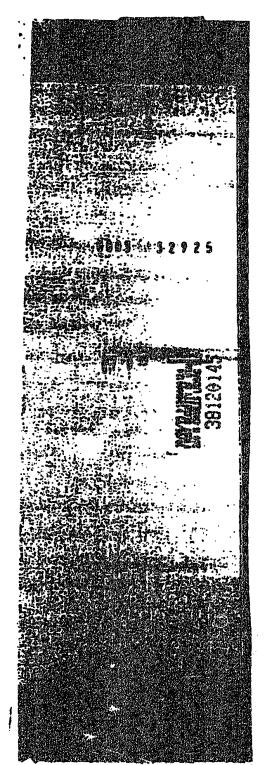


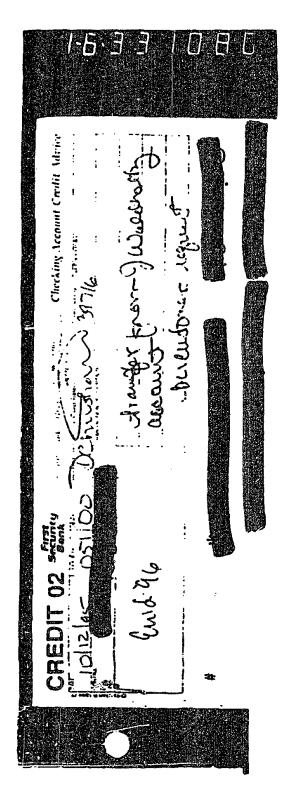


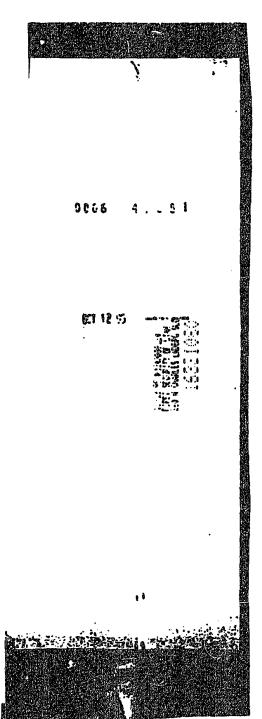


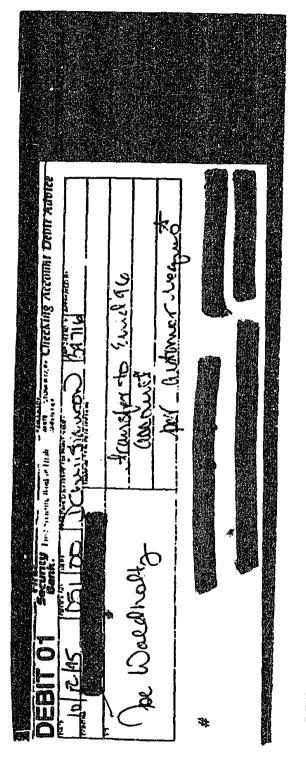


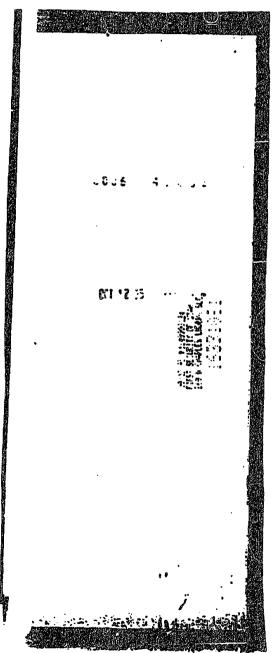




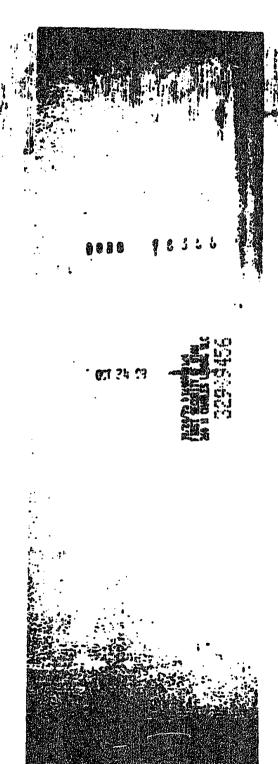


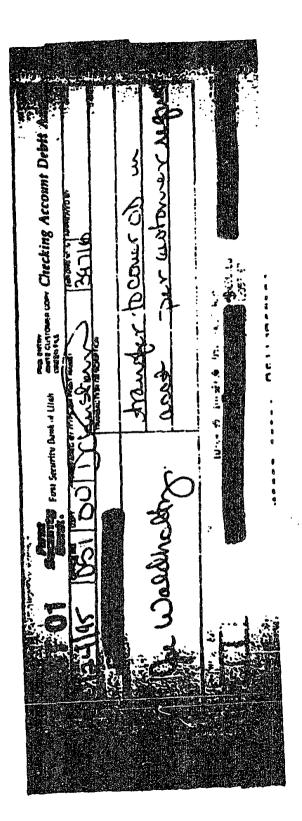


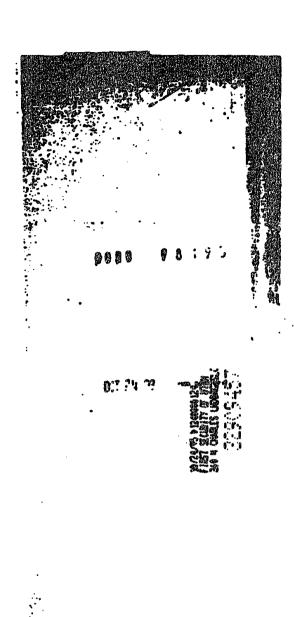




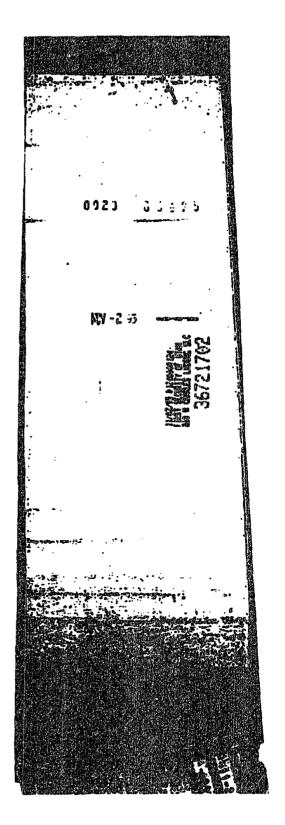
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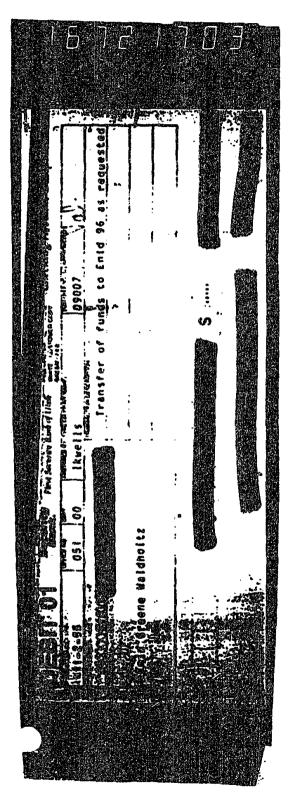


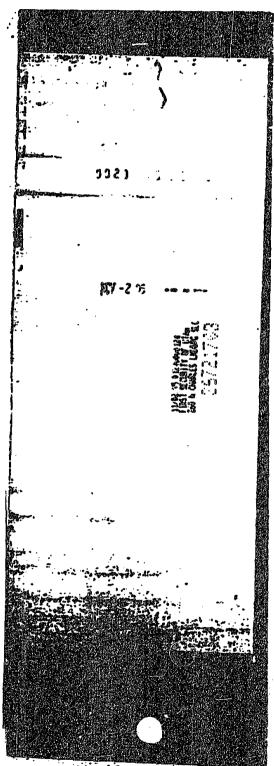


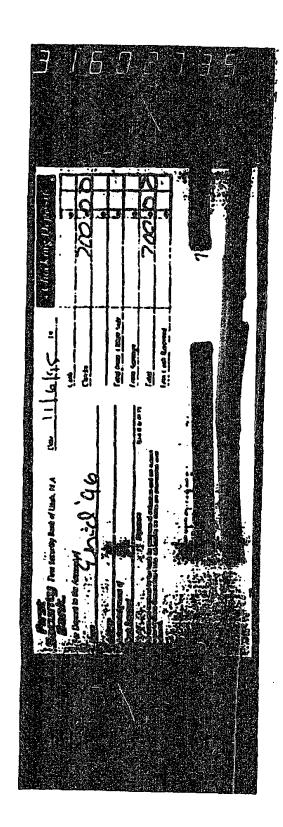


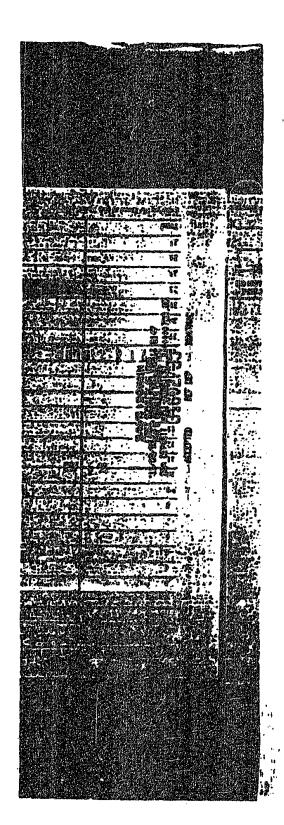
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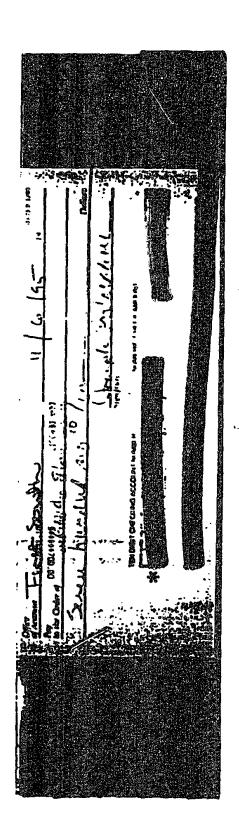


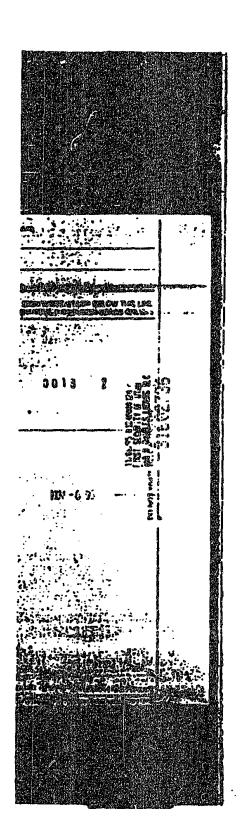












On Information and Belief, Cash Contributions Made by Joseph Waldholtz to ENID '94 and ENID '96 in 1994 and 1995

-		 	, –			_						,	 , ,
	Endorser Comments								One amount in deposit was cash.	One amount in deposit was cash.			
	Signer												
	Payee												
Type of	Transact.												
	Type	ပ	ပ	ပ	ပ	ပ	ပ	ပ	ပ	ပ	ပ	ပ	
Destination	A/C#												
	Bank	FSB	FSB	FSB	FSB								
	Amount	1,000.00	1,500.00	2,000.00	2,500.00	500.00	5,000.00	3,000.00	125.00	100.00	100.00	2,500.00	\$18,325.00
	Type												
Source	A/C#												
	Bank												
	Date	03/02/94	03/03/94	03/08/94	03/09/94	04/18/94	04/25/94	05/27/94	07/01/94	08/31/94	09/07/94	56/80/80	TOTAL

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Figure 18 First Security Bank of Ulat, N.A. Date Marked 2, 1994	Clinckrig Dignerit	
For Deposit to the Account of	1 000	7
Name Engly 94	•	Γ
1125 SCATEMENT		T
Acknowledgment of Josef from Other Side	0	T
D4R 892 77	8	T
to the Uniform Commercial Code. All creates for items are provinced until	9	Т
TEN DIGIT CHECKING ACCOUNT NUMBER DEPOSIT TOTAL	TAL	1

FILEST First Security Bank of Utah, N.A. Date 3-	3-3 19 W	The Mark District	estation (
	Cest	000	· · ·
Name (1774) 20	Quests	•	
		•	
elgment of strong	Total from Other Side		:
D-4 R 6/2 7/	Total	0	
All sense are recurred by the beath for pergrams of extitection and are ordered. All principles Commonwell Cods. All credits for areas are provenessal until collected.	Less Cash Received	•	<u></u>
TEN DIGIT CHECKING ACCOUNT NUMBER	DEPOSIT TOTAL	JTAL.	um.
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First Security Bank of Utan. N.A.	Date 3 - C 127	
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or Deposit to the Actuality of	Checks	•
(2) 12 12 25 15 15 15 15 15 15 15 15 15 15 15 15 15		•
cknowledgment of	Total from Other Side	
Signature ID-6 R 8-92 77	Total	ē
the Uniform Commercial Code. All credits for inconcilor and as a solved. It is the Uniform Commercial Code. All credits for incon are provisional usual.	Less Cash Received	

TEN DIGIT CHECKING ACCOUNT NUMBER

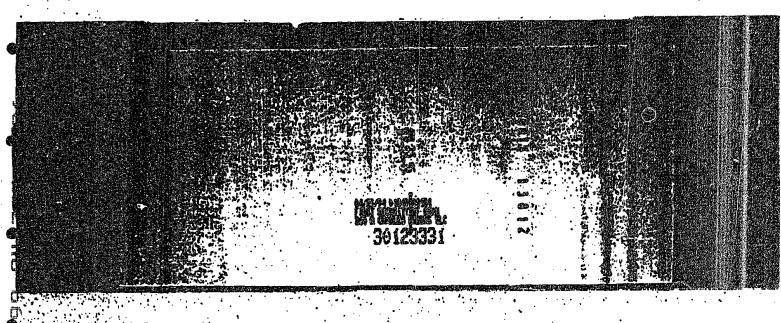
DEPOSIT TOTAL

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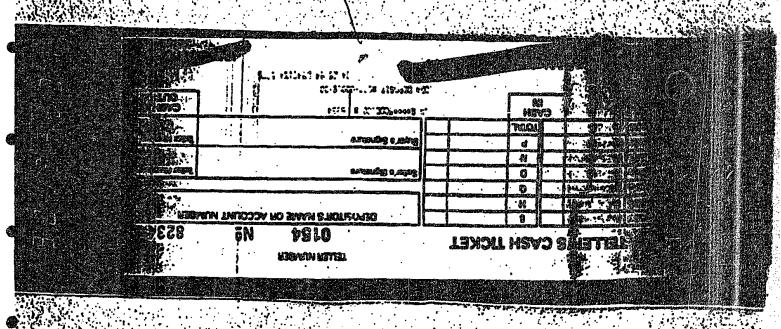
Checking Deposit	25 co 0	•	•	•	0	•	TAL
Figure 7 - 8 and No. of the Same of the Sa	Manual tras searchy canny cann		Name of Carlot	Achonouled general of the Side	De Remin	All steams are received by the beats for perposes of collections and one majority to the Uniform Commencial Code. All credits for leafs are provisioned used	JUNT NUMBE

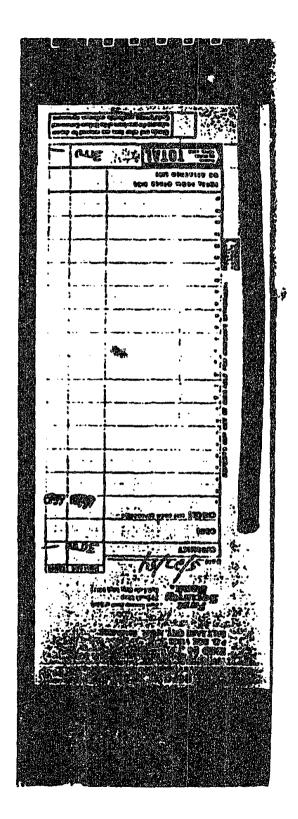
2500.00

Checking Deposit	380	0	•		6	5000 S			117		9	Ω 2	, 3
Security First Security Bank of Ulah, N.A. Date 4-18 19 94	For Deposit to the Account of	D 24	Address De Bus 10232 Sciut Said - Consultant of Cash Received Total from Other Side	1D-6 R 892 77	All states are received by the bank for purposes of collection and are subject to the Uniform Commercial Code. All credits for items are provisional until collected. Less Cash Recrived	TEN DIGIT CHECKING ACCOUNT NUMBER DEPOSIT TOTAL	11.	ACCEPTED REF DEP REJUTSC	04/18/96 15:18:56 054 0154 5096 00A DEPOSIT	18 95			

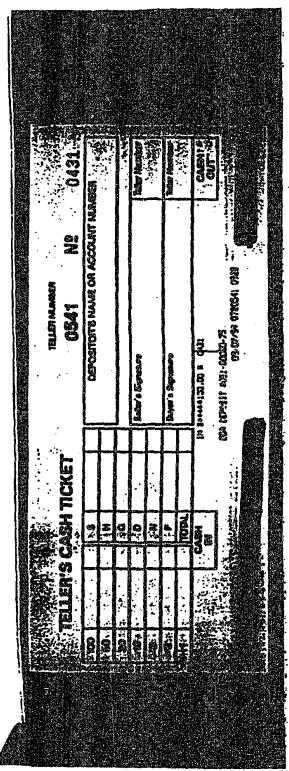


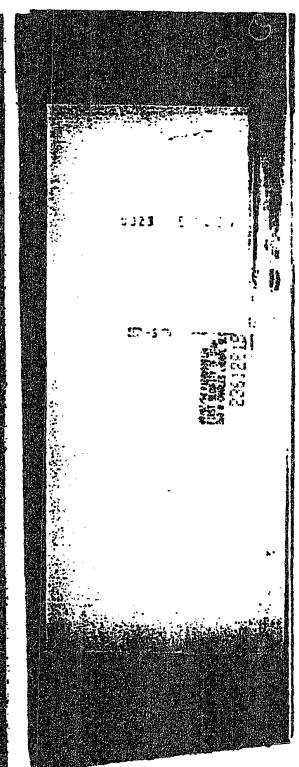
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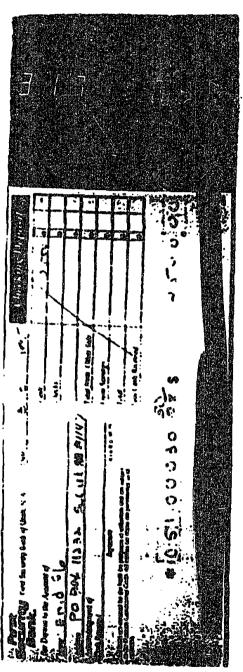




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On Information and Belief, Commingling of Personal Funds and ENID '94 and ENID '96 Campaign Funds By Joseph Waldholtz in 1994 and 1995 Using Transfers from Campaign Accounts Into Personal Accounts

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		Amount		\$300.00	1,400.00	300.00	3,000.00	4,200.00	15,000.00	20,000.00	2,500.00	2,000.00	1,000.00	650.00	200.00	3,000.00	400.00	500.00	2,000.00	3,100.00	200.00	1,200.00	50.00	750.00	500.00	736.93	46.58	341.01		\$63,374.52
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		Date		02/14/94	02/15/94	02/16/94	03/31/94	04/04/94	10/19/94	01/12/95	04/26/95	04/27/95	05/11/95	05/12/95	05/22/95	05/23/95	05/25/95	05/25/95	05/25/95	05/26/95	05/30/95	05/31/95	06/07/95	06/03/95	06/12/95	06/21/95	03/19/95	08/09/95		TOTAL

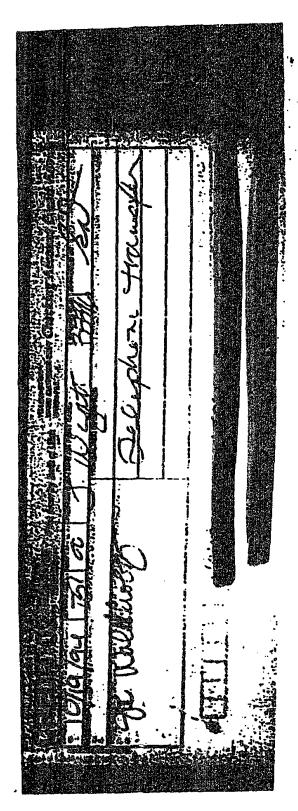
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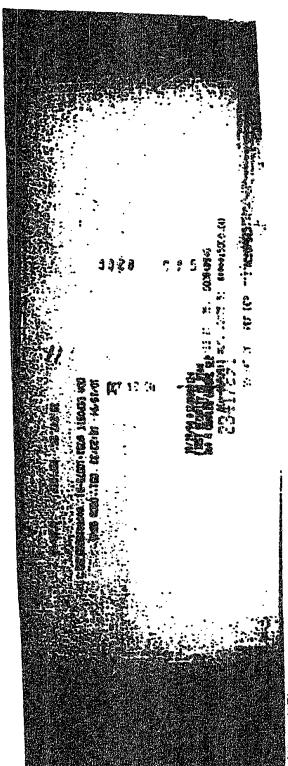
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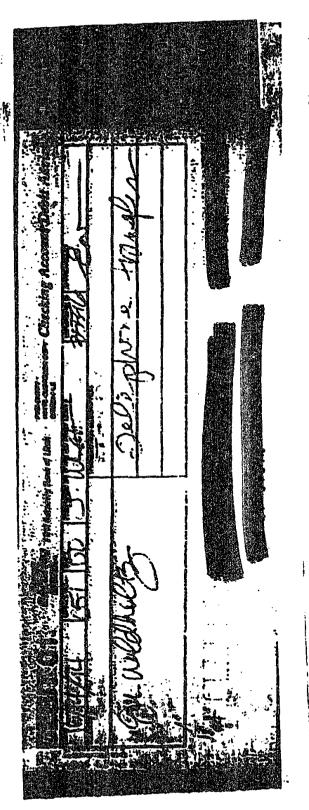
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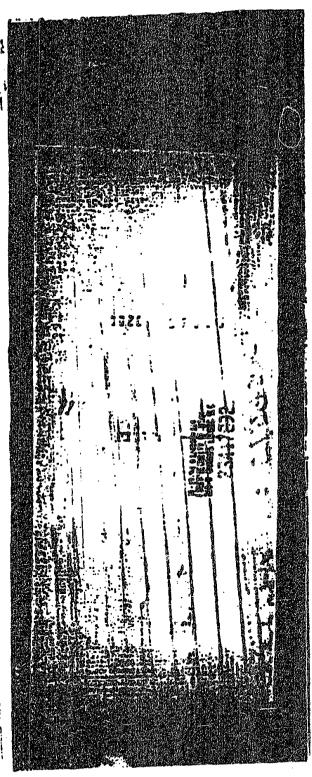
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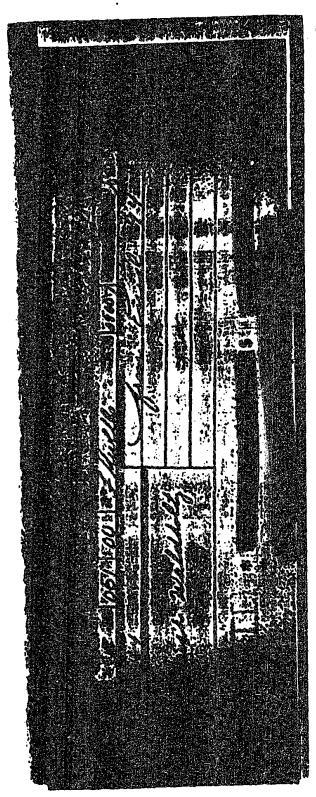


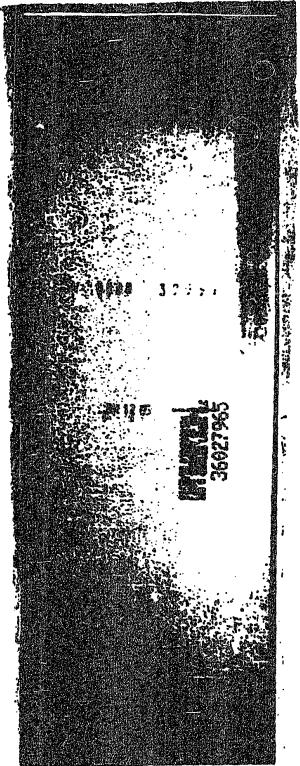


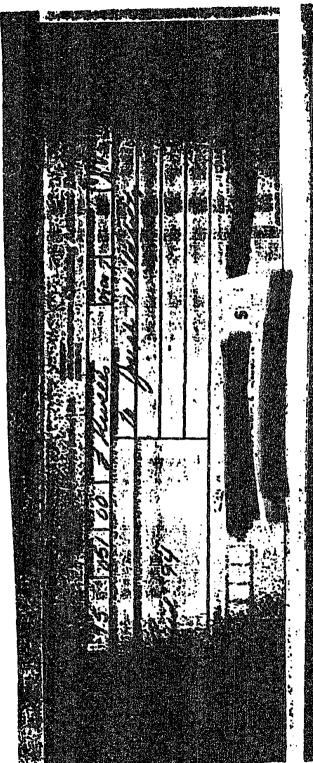
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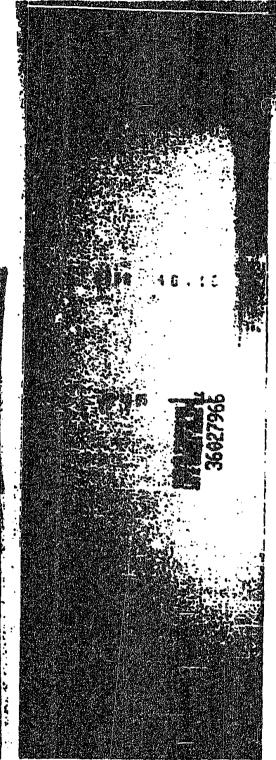


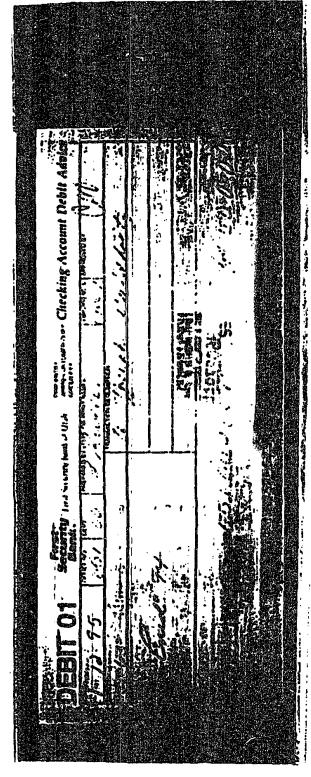


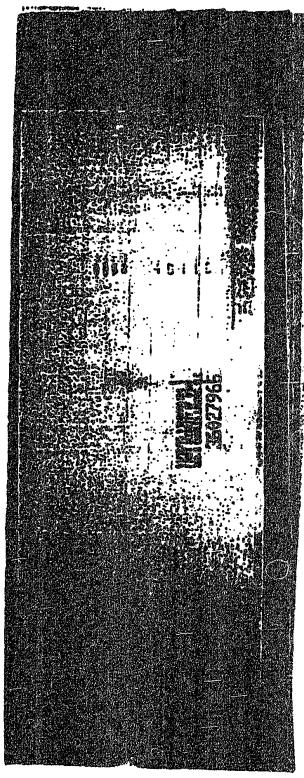


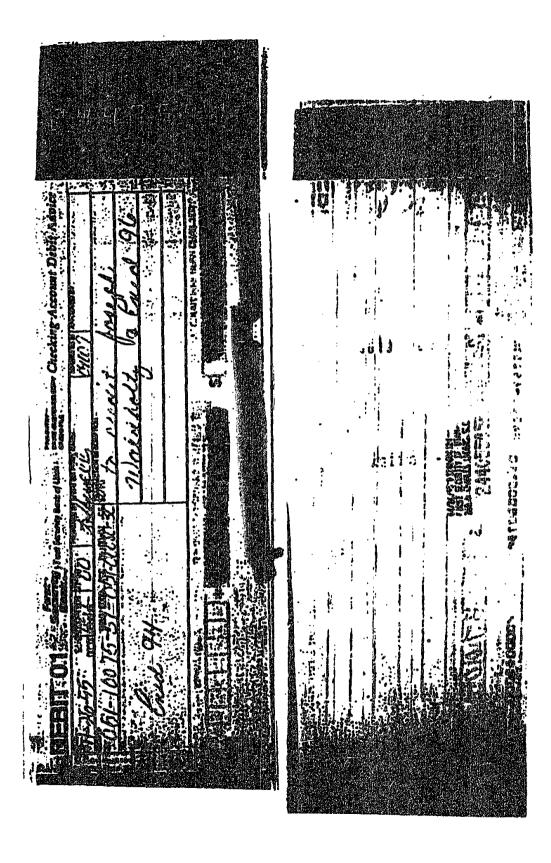


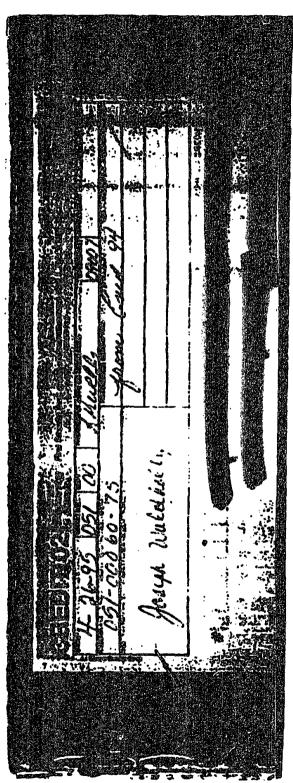


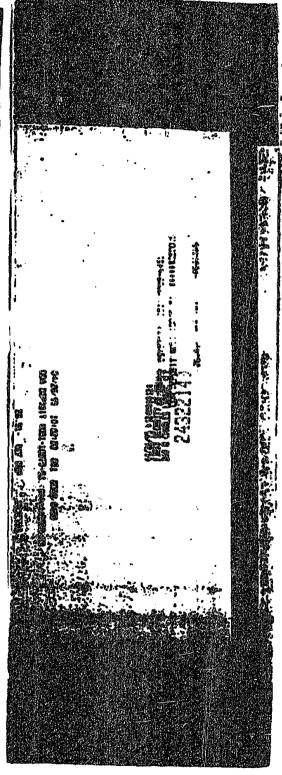


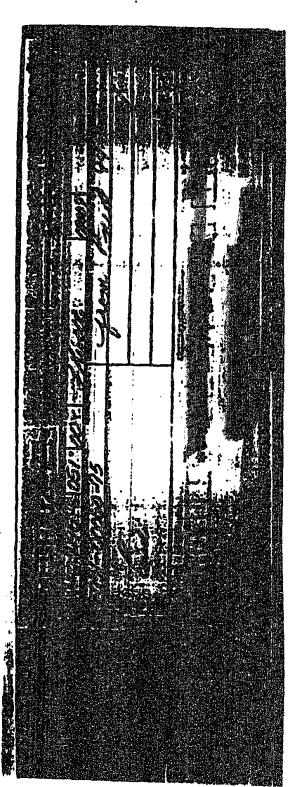


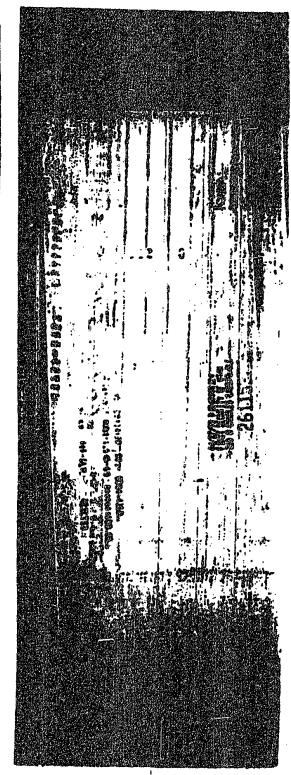


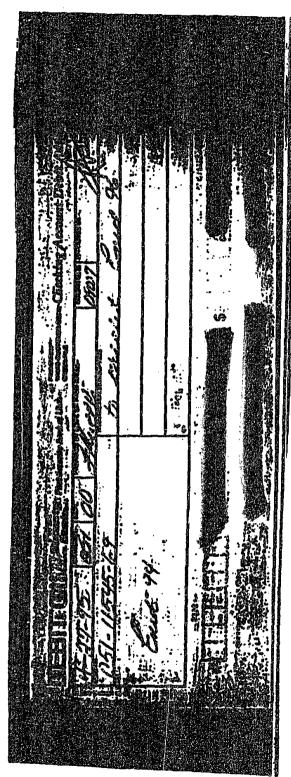


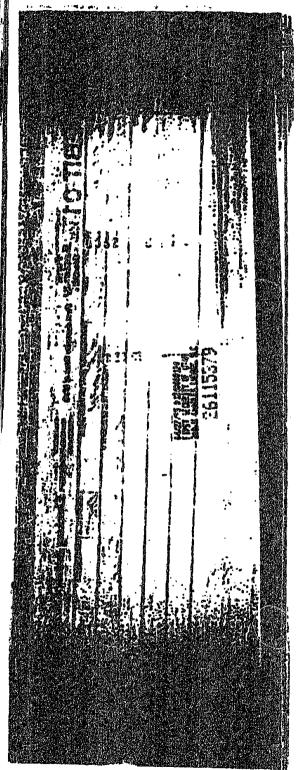


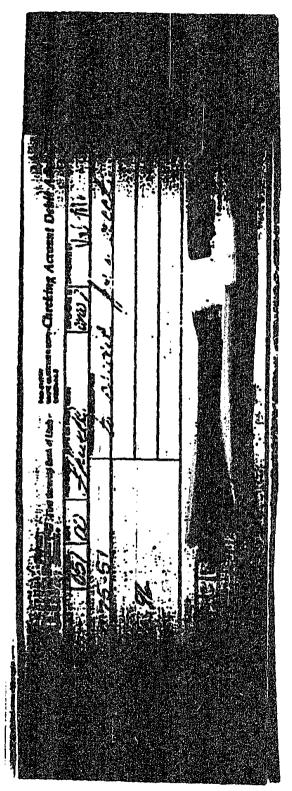


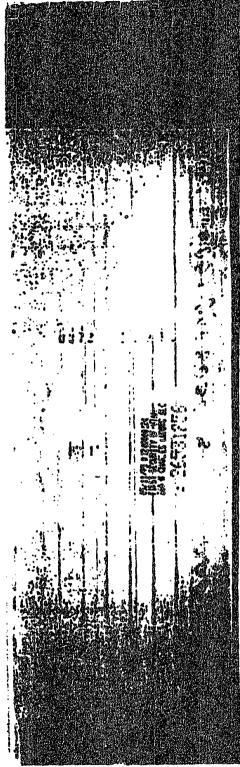


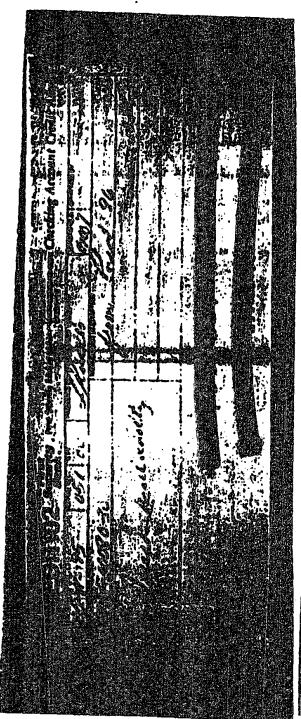


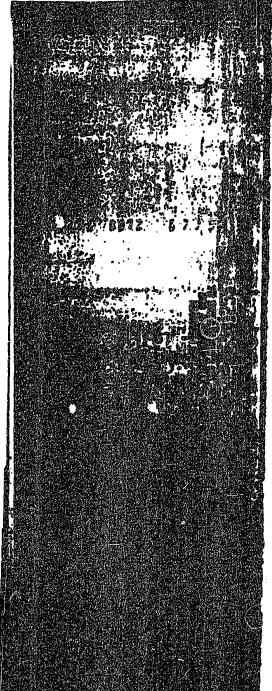


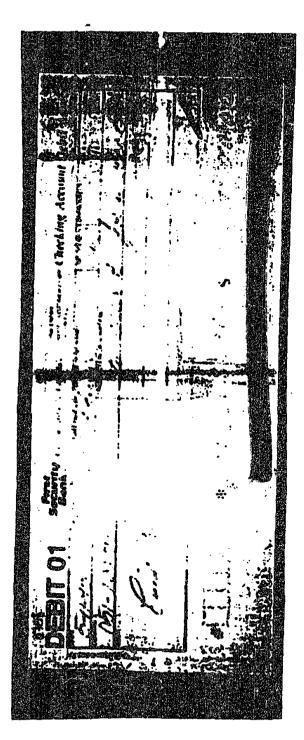


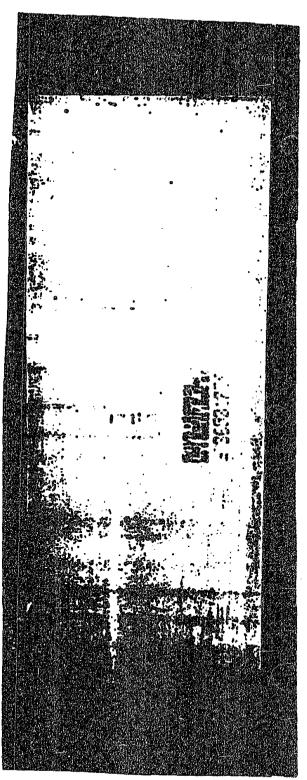


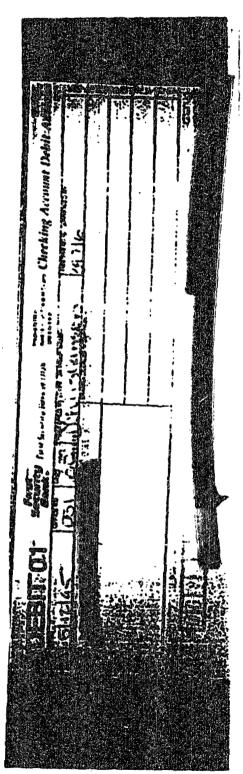


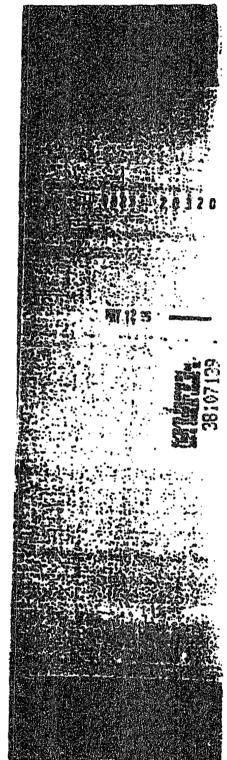


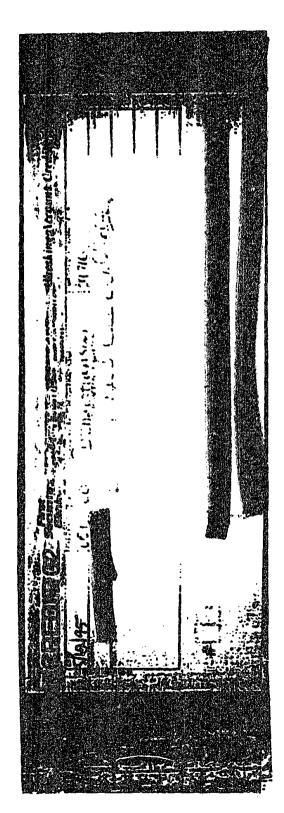


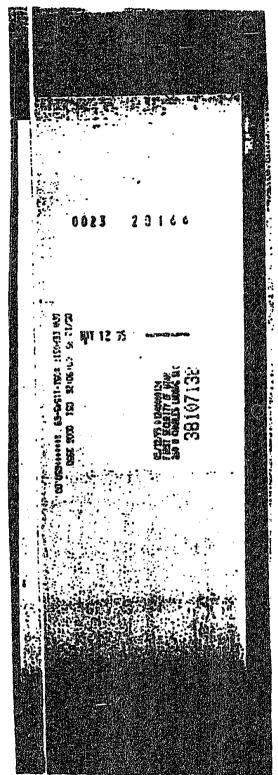


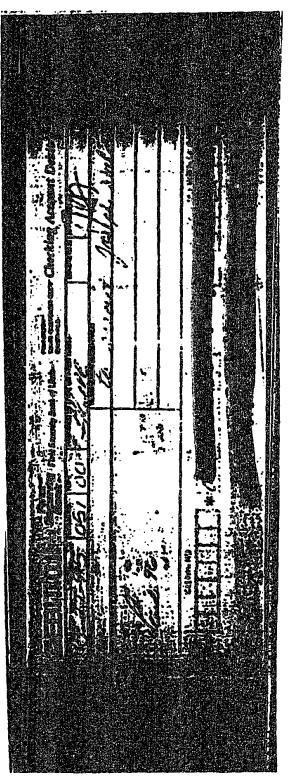


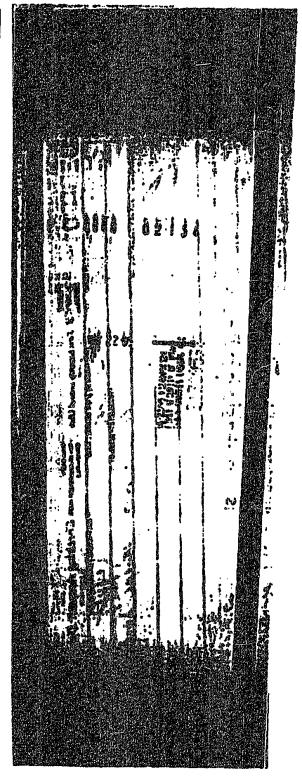


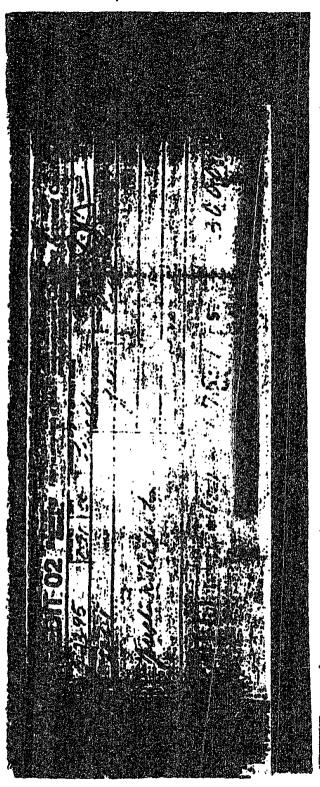




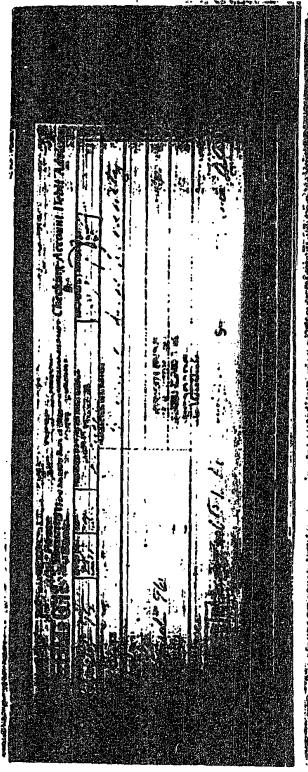


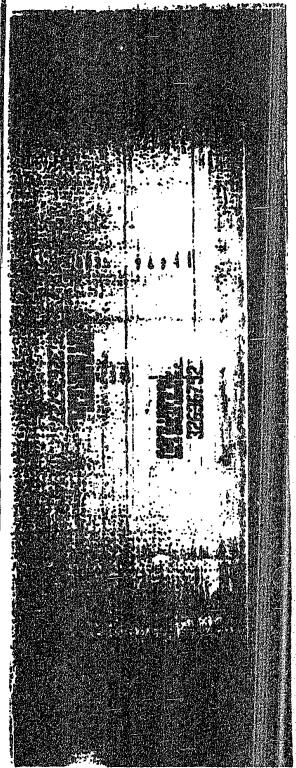


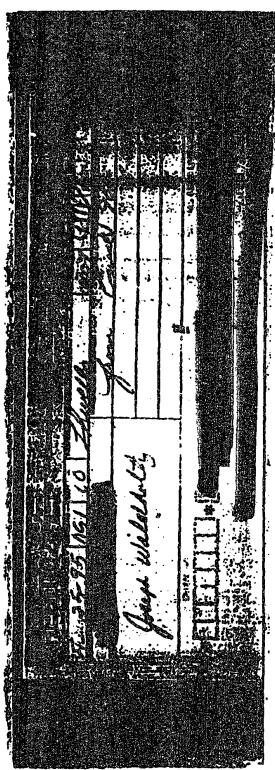


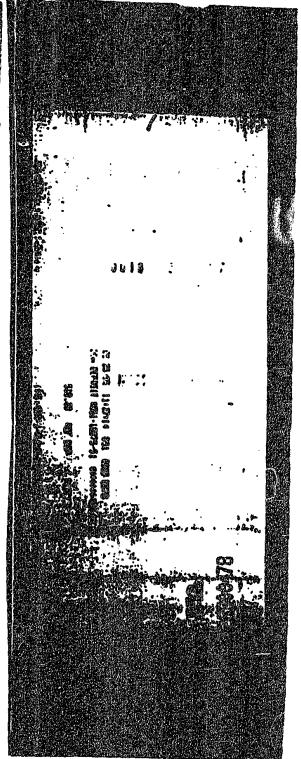


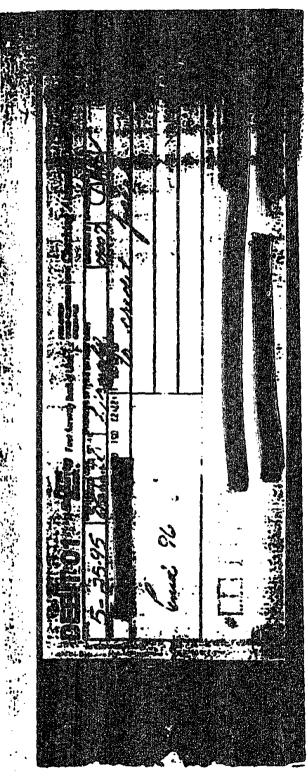


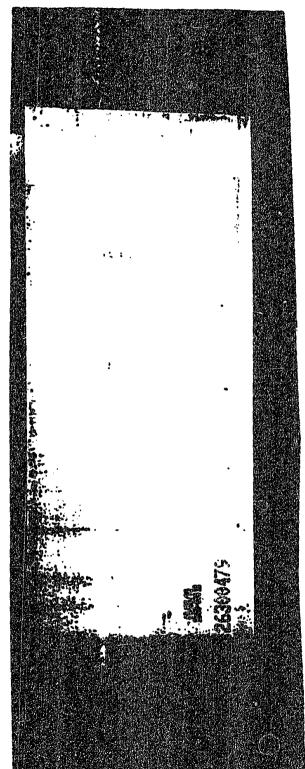


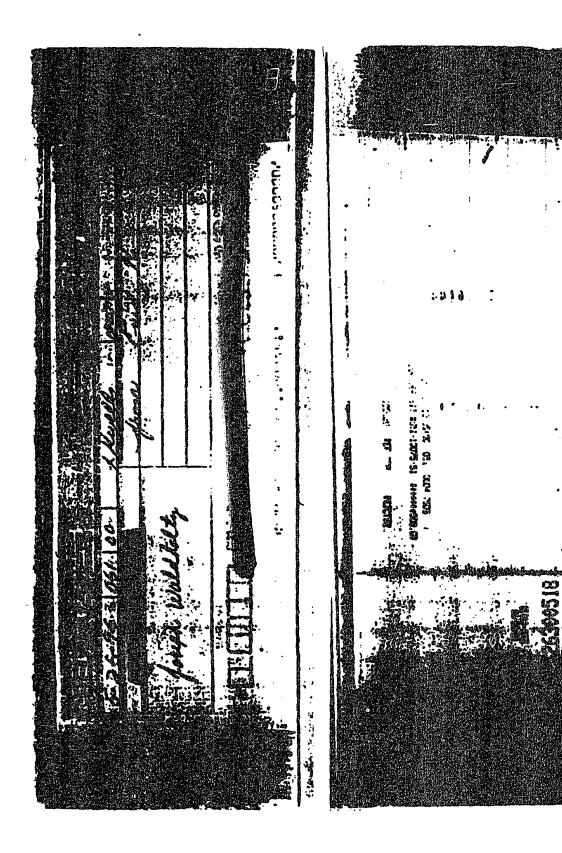






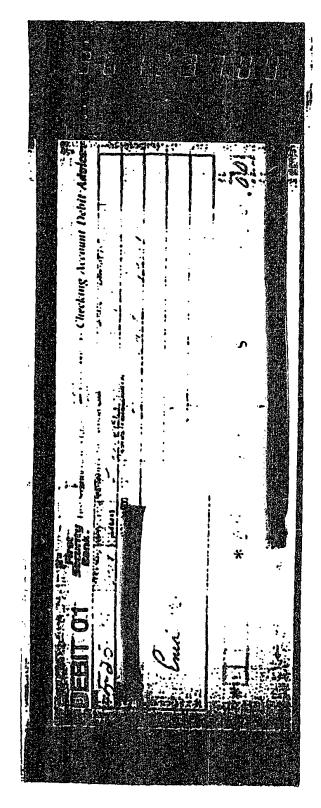


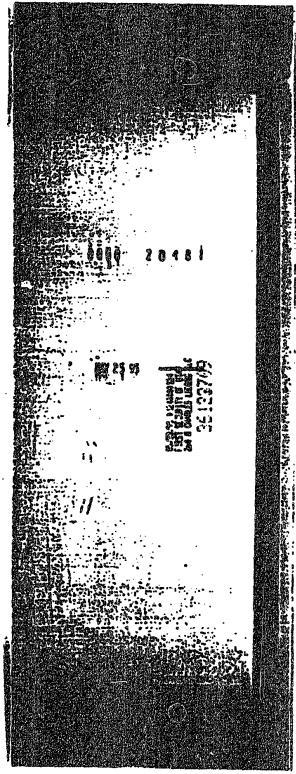


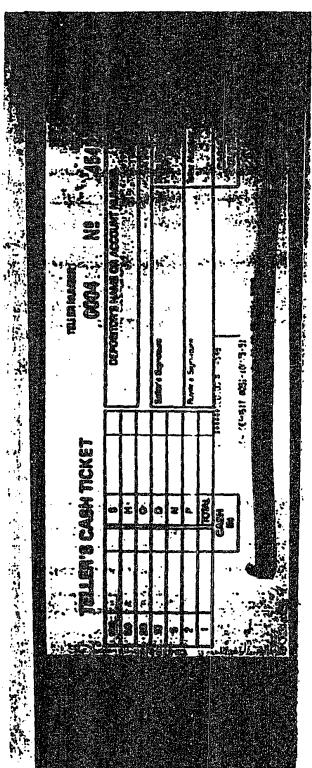


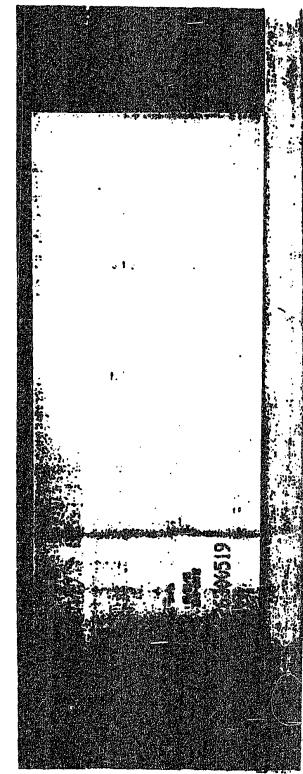
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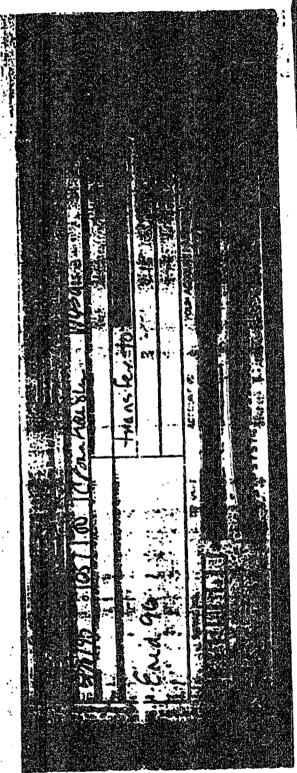
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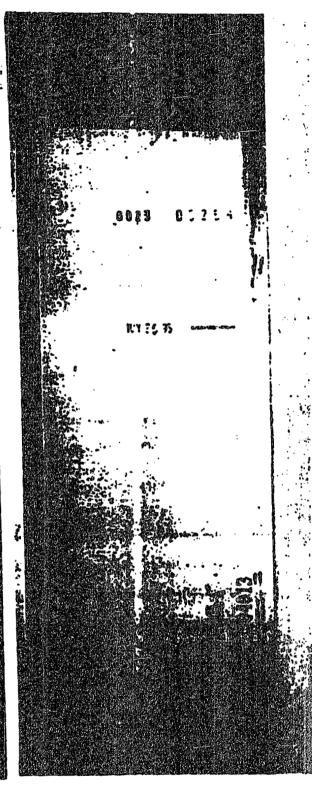


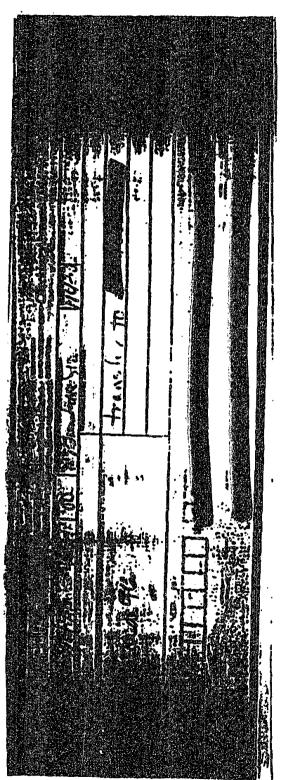


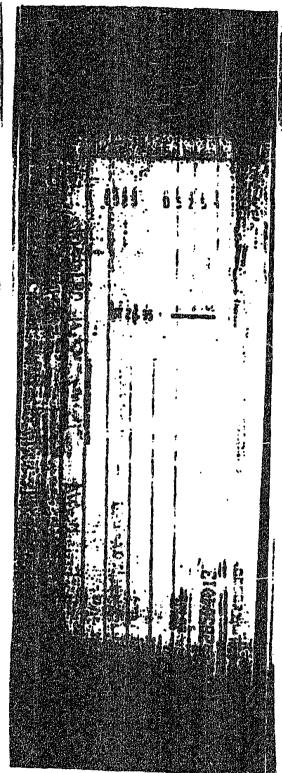


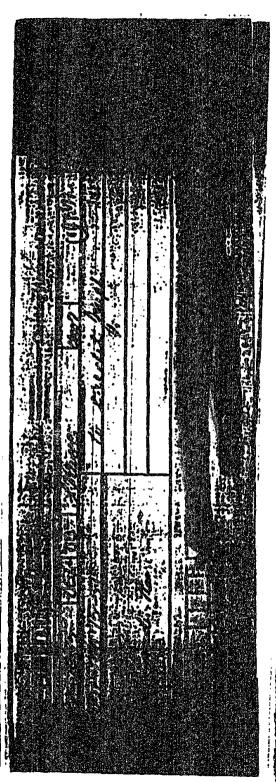


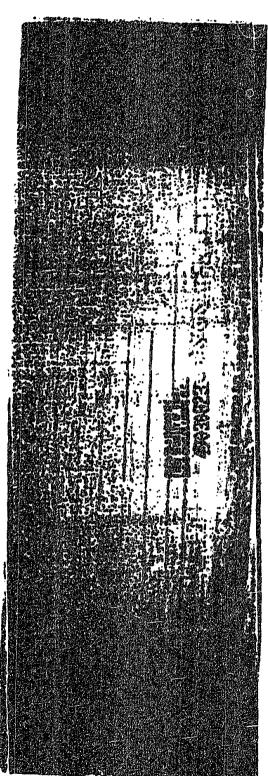




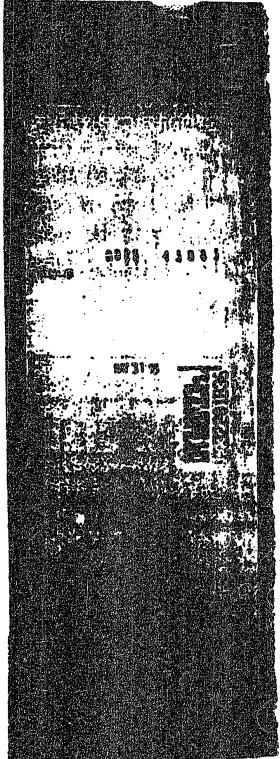


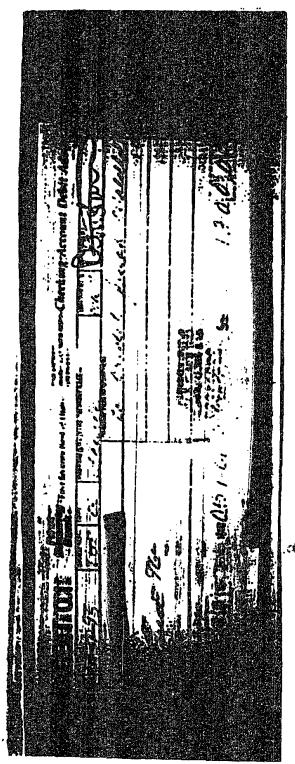


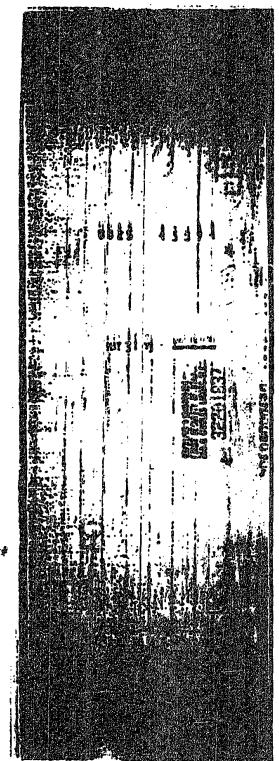


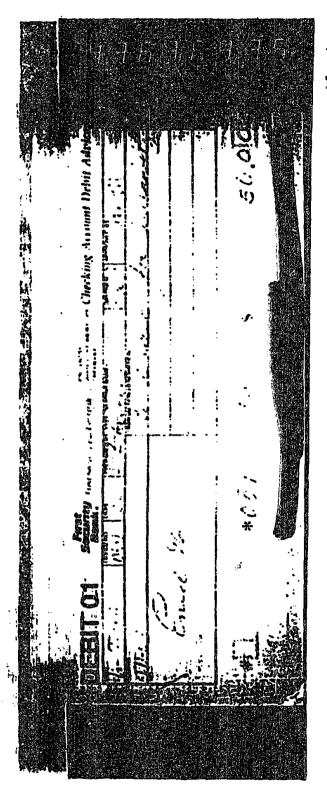


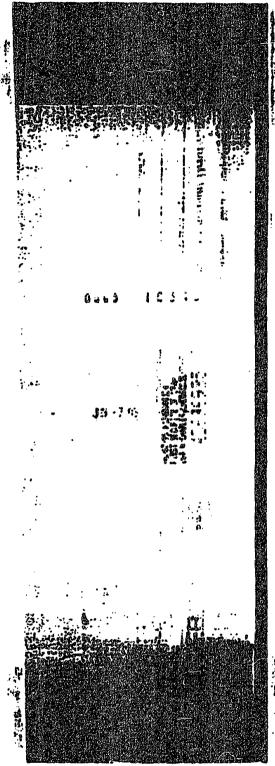


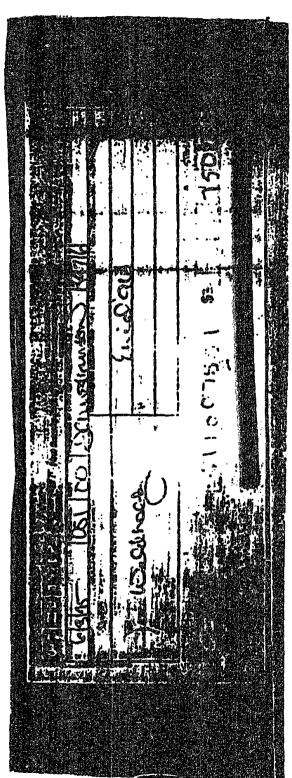


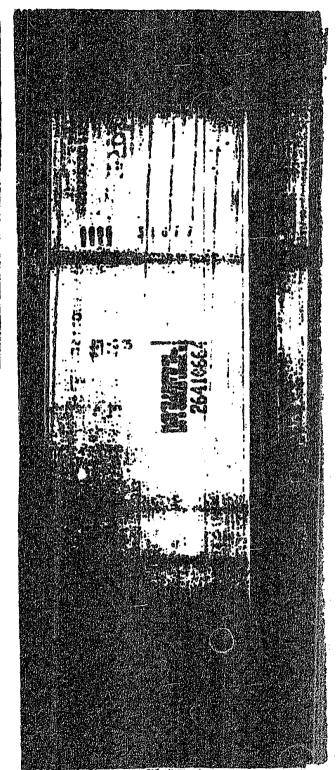


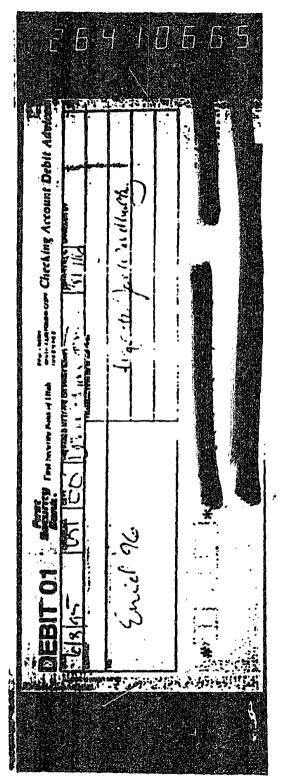


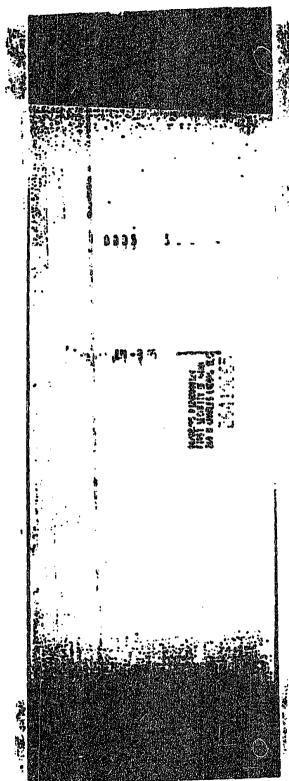


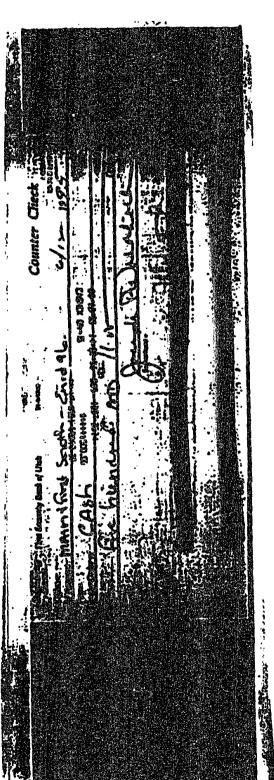


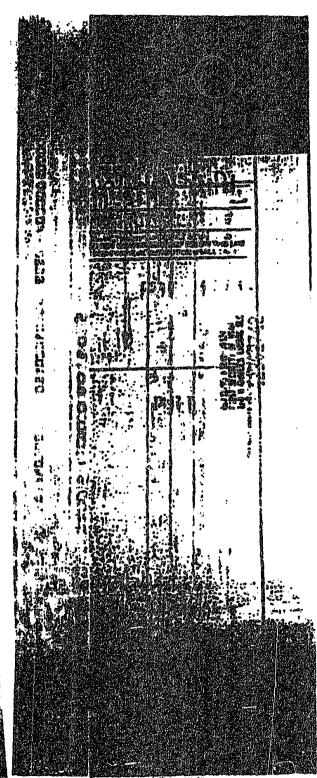


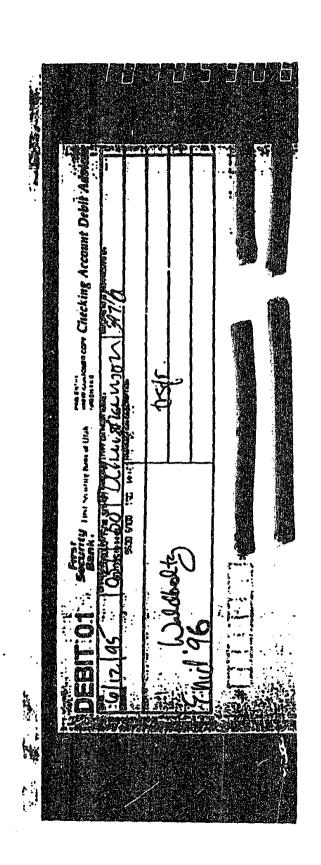


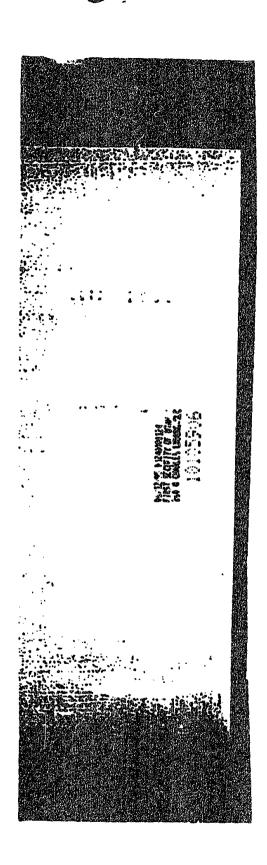


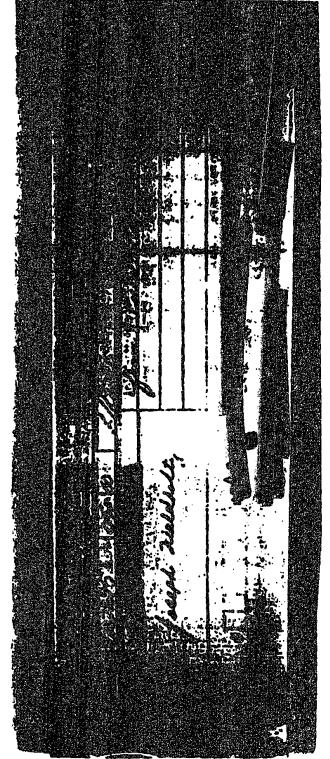


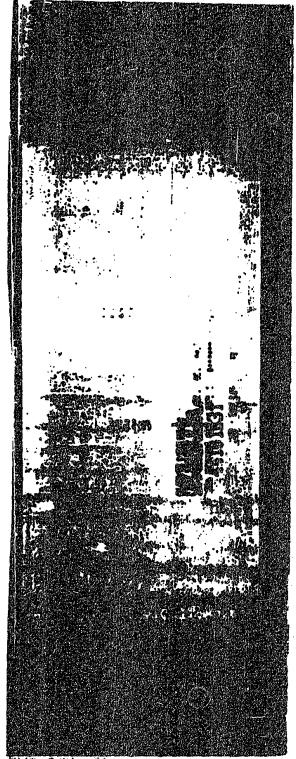


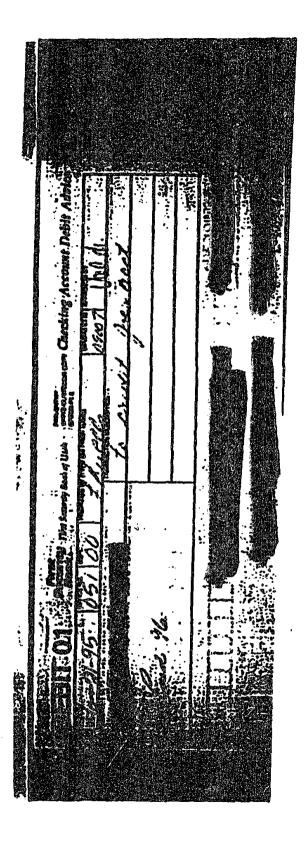


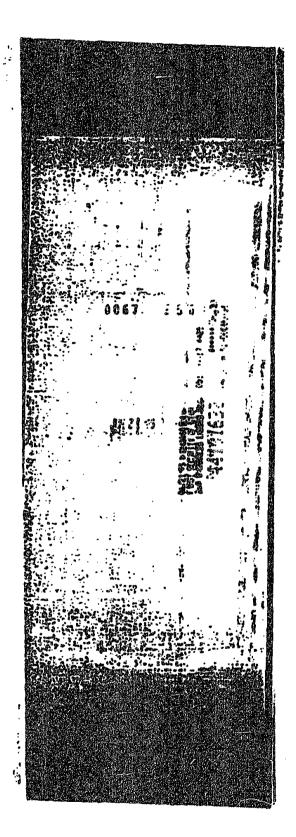


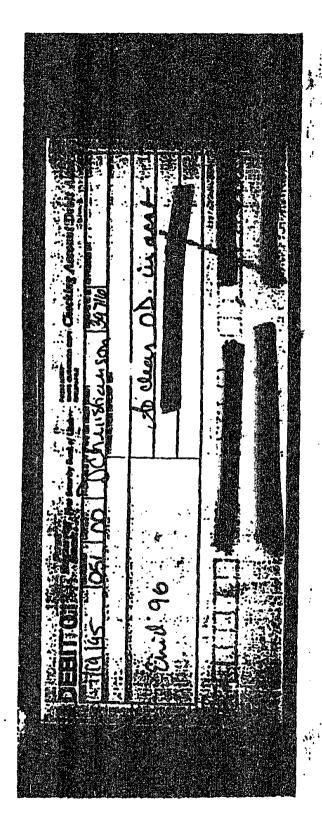


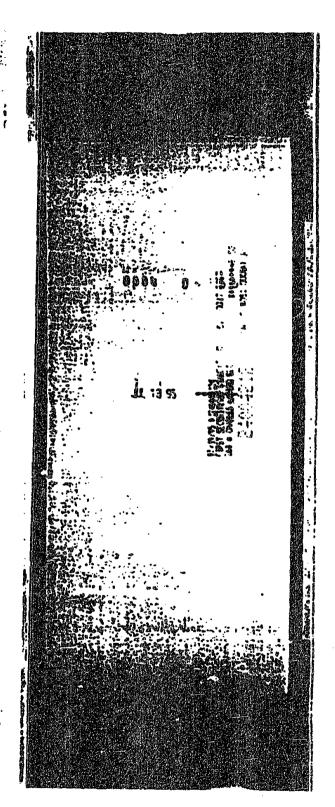


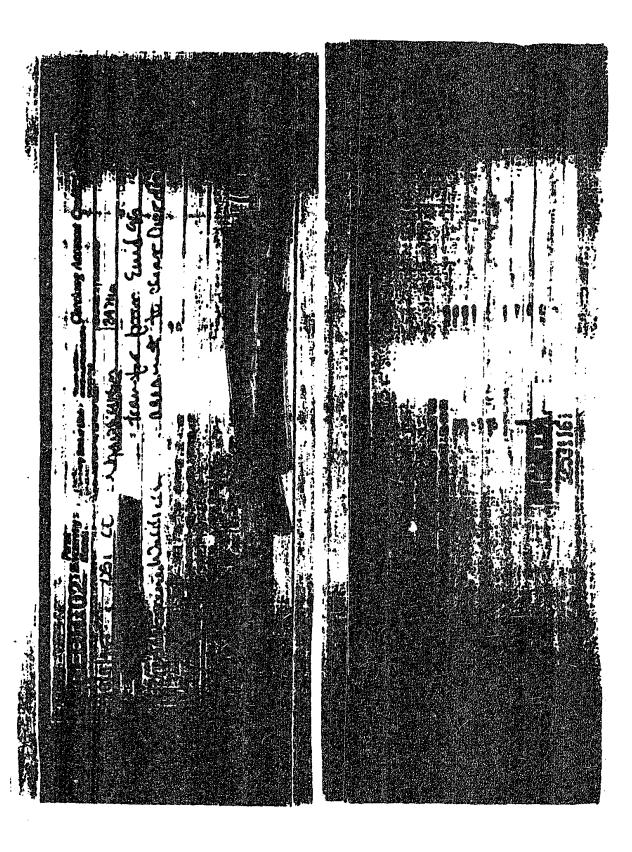


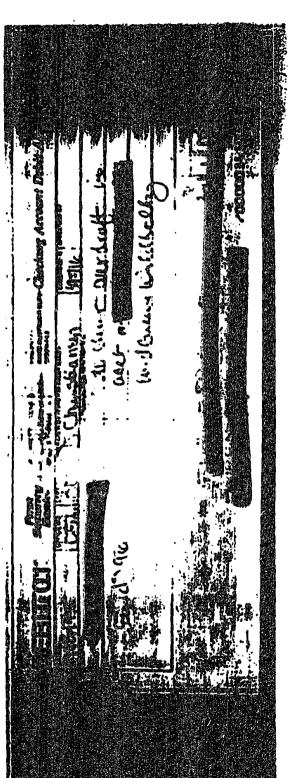


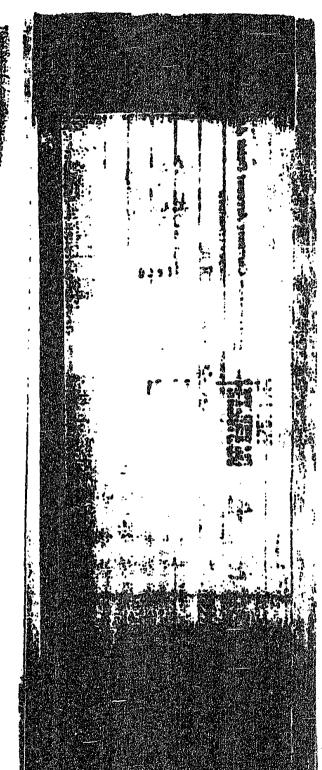












On Information and Belief, Deposits of Checks By Joseph Waldholtz Into His Personal Account

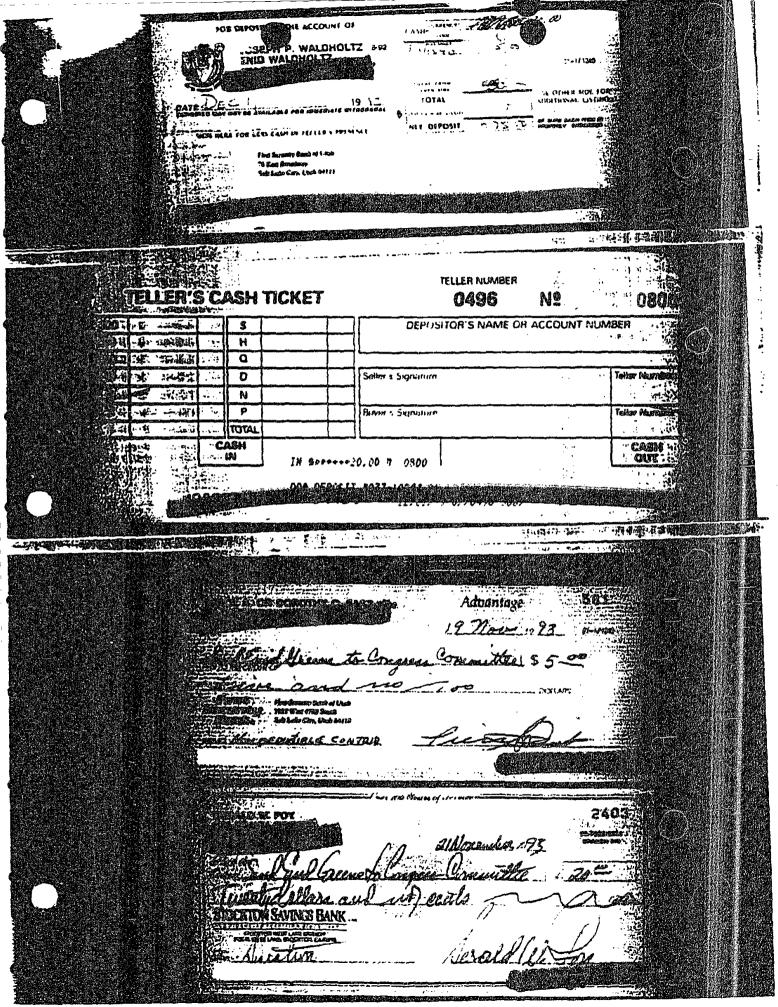
Made Payable to Send Enid Greene To Congress

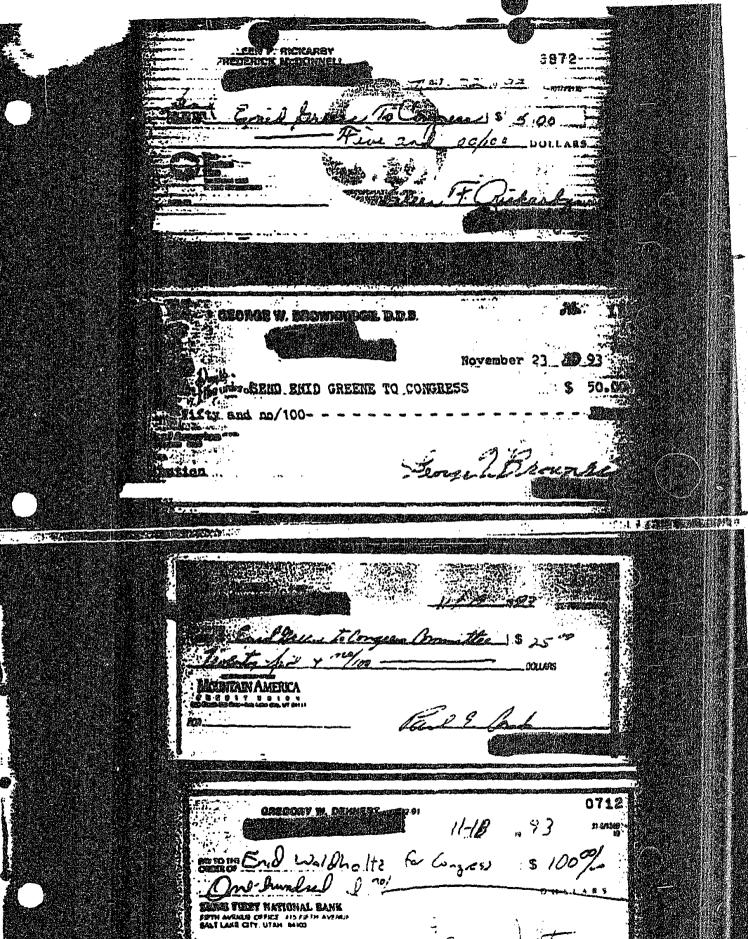
		ra din 1886, na pandala di Managara dina sa
Payor	Date	Assount
Pierce A. or Dorothy C. Fast	11/19/93	\$5.00
Gerald W. Fox	11/21/93	20.00
Eileen F. Rickarby	11/22/93	20.00 5.00
George W. Brownsidge, DDS	11/23/93	50.00
Paul E. Combs	11/23/93	25.00
Gregory W. Dehnert	11/18/93	100.00
W. Boyd and Jean C. Christensen	11/22/93	100.00
June H. Russell	11/22/93	20.00
Amy Allen Price	11/20/93	25.00
David G. or Irene H. Erickson	11/20/93	25.00 25.00
John F. or Eileen J. O'Brien	11/21/93	10.00
Heinz or Helen Reinhold	11/19/93	10.00
Ferris M. or Lorna N. Johnsen	11/21/93	10.00
John F. Greeney	11/23/93	10.00
Michael E. O'Conneil	11/23/93	100.00
W. Harrison Eller	11/23/93	20.00
J. Paul Jewkes	11/19/93	20.00
Anthony W. and Carol Middleton	11/17/93	10.00
David or Gina Gunn	11/27/93	100.00
Mark or Diane Taylor	11/26/93	25.00
William C. Zimmerman	11/26/93	20.00
Doris J. Williams	11/28/93	100.00
Theodore R. York	11/26/93	20.00
Geraldine C. Callister	11/29/93	500.00
Mark H. Greene, MD	11/26/93	100.00
Helen T. and David Ballsteadt	11/28/93	3.00
John and Chris Springman	11/29/93	50.00
Lea Marie and William Filtz	12/01/93	10.00
Russell W. Haas	12/01/93	25.00
Gary L. Taylor	Illegible	10.00
JW or Nina Rasmussen	12/01/93	5.00
James E. or Regina Mitchell	12/03/93	100.00
David or Lori Buhler	12/04/93	100.00
Orval C. Harrison	12/03/93	100.00
Stewart or Liz Clark	12/02/93	50.00
Beeslev	12/14/93	_1,000.00
	TOTAL	\$2,883.00
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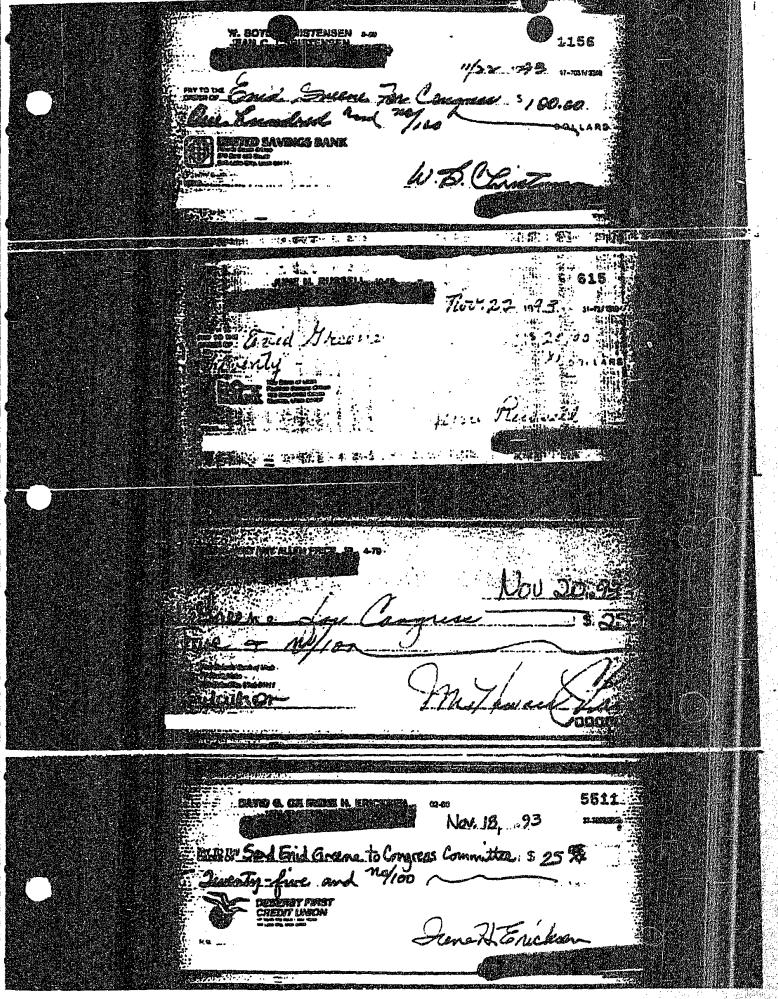
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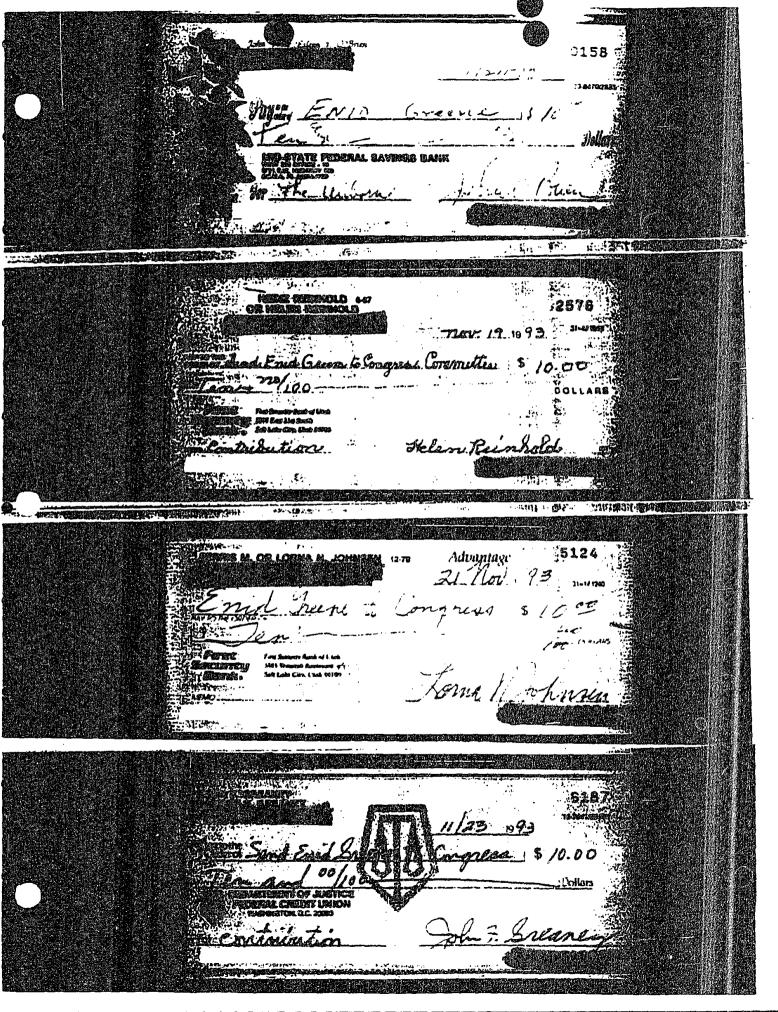
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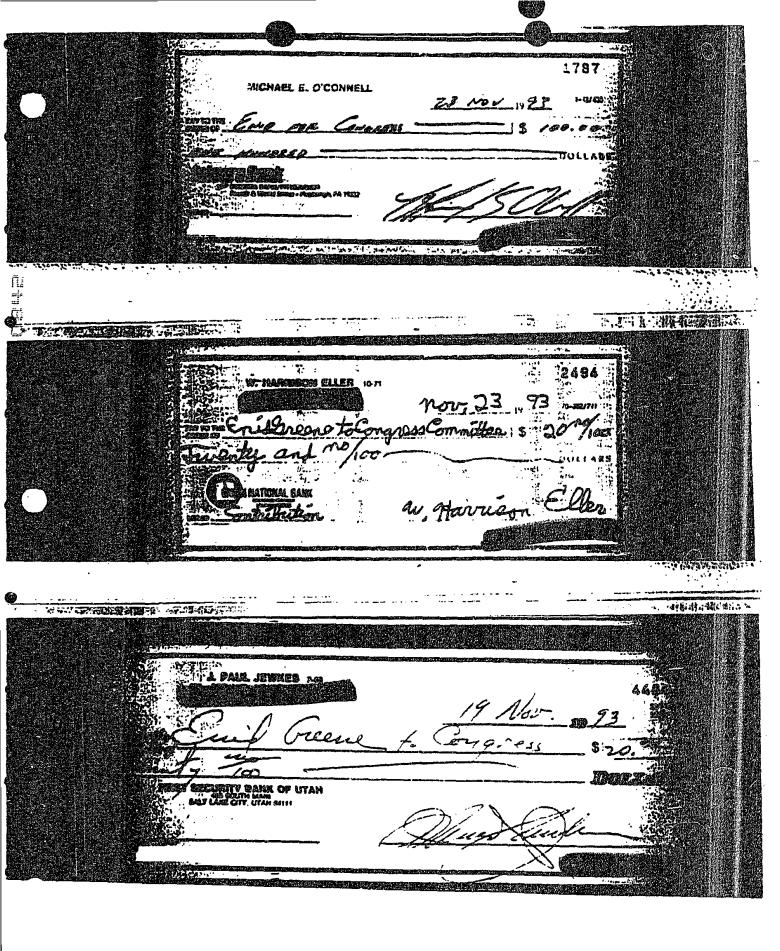
It should be noted that the above list reflects only those checks identified to date which are made payable to Send Enid Greene to Congress, Committee or equivalent and deposited into Joseph Waldholtz' personal account at First Security Bank.

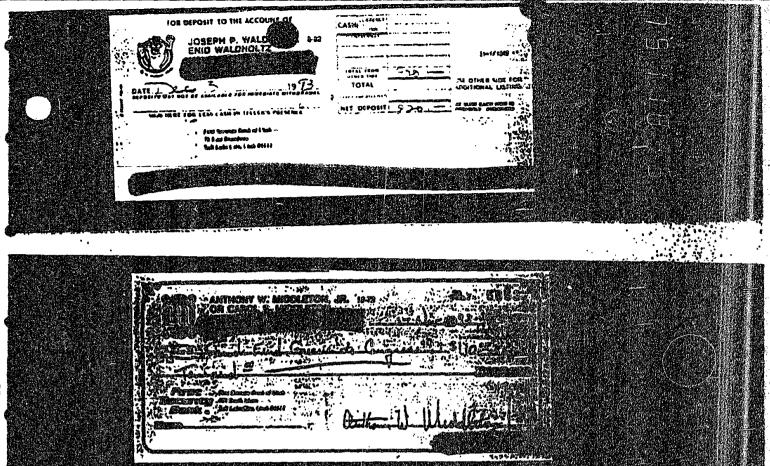


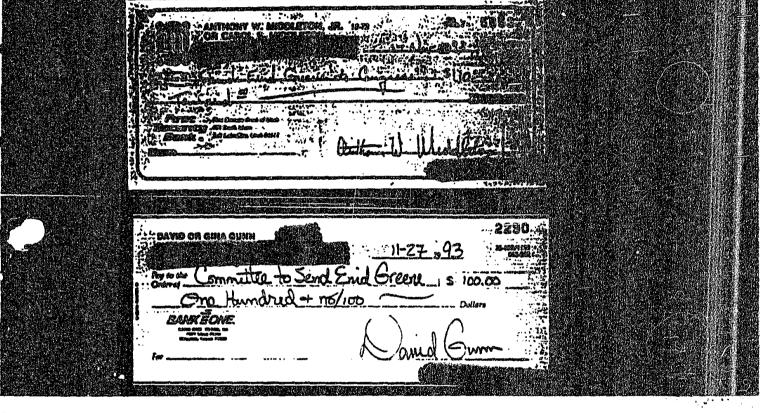


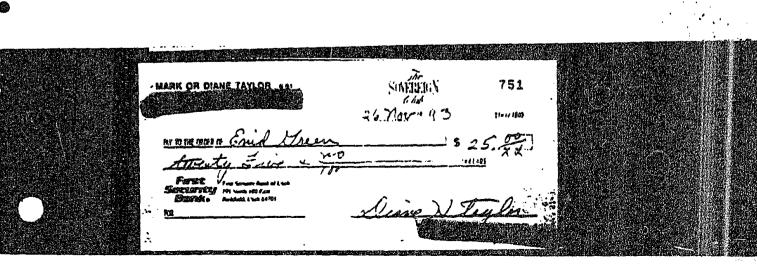


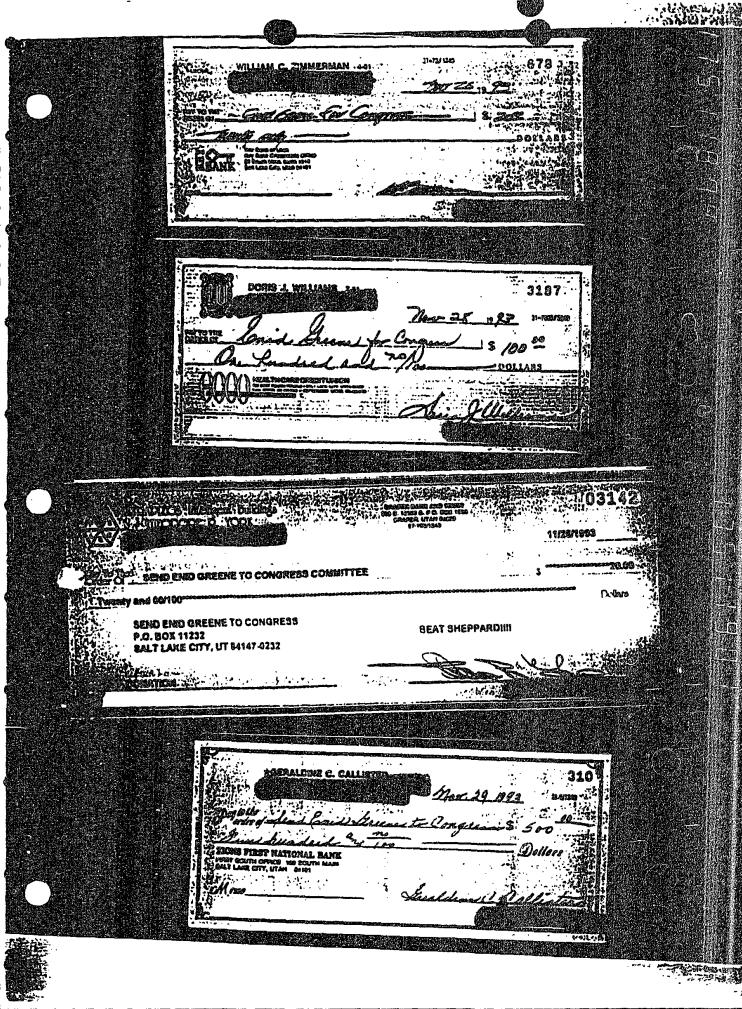


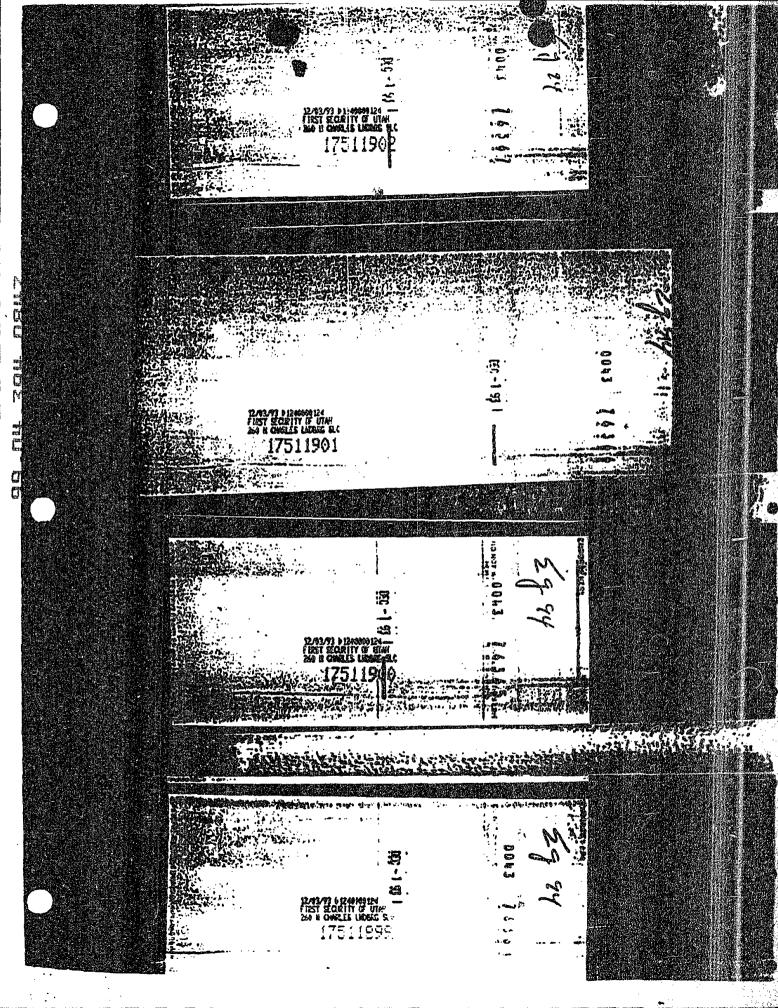


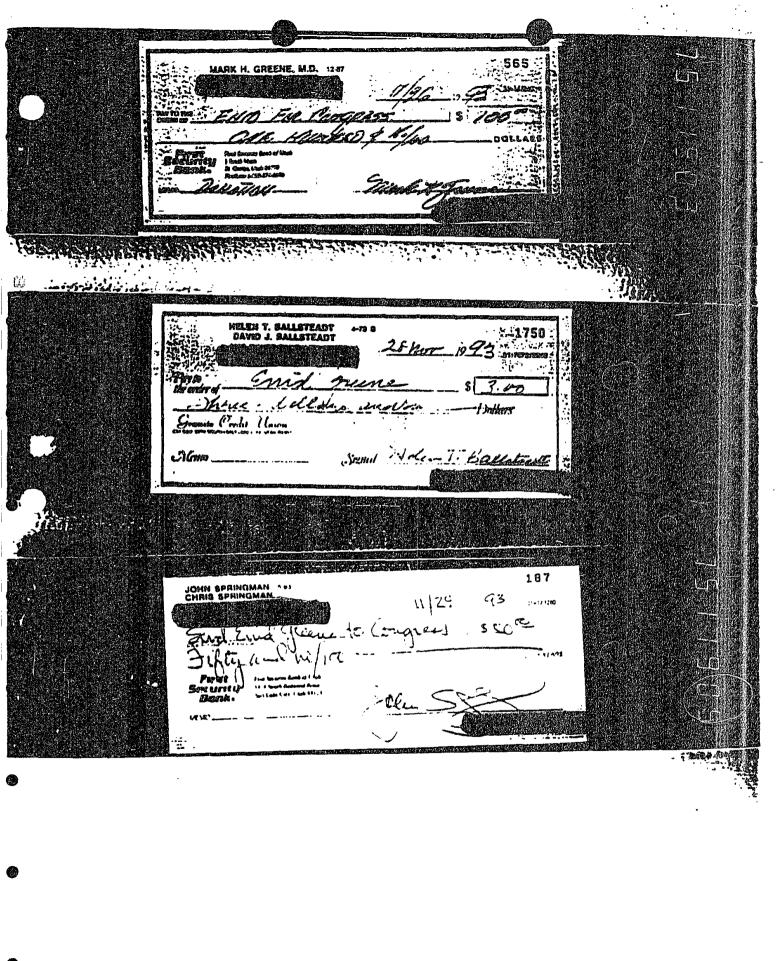


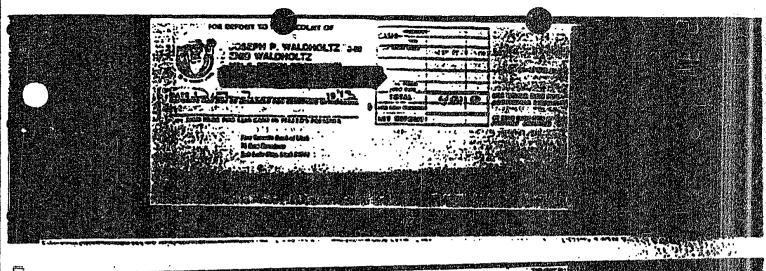


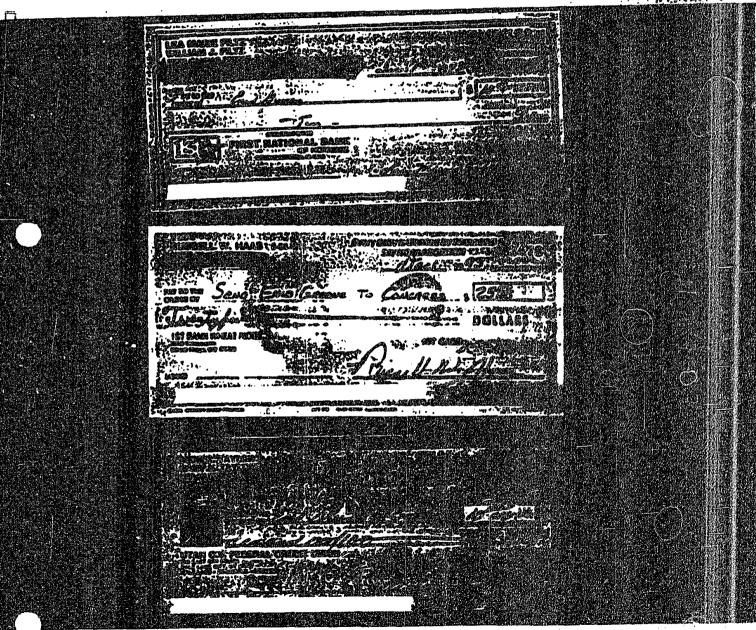


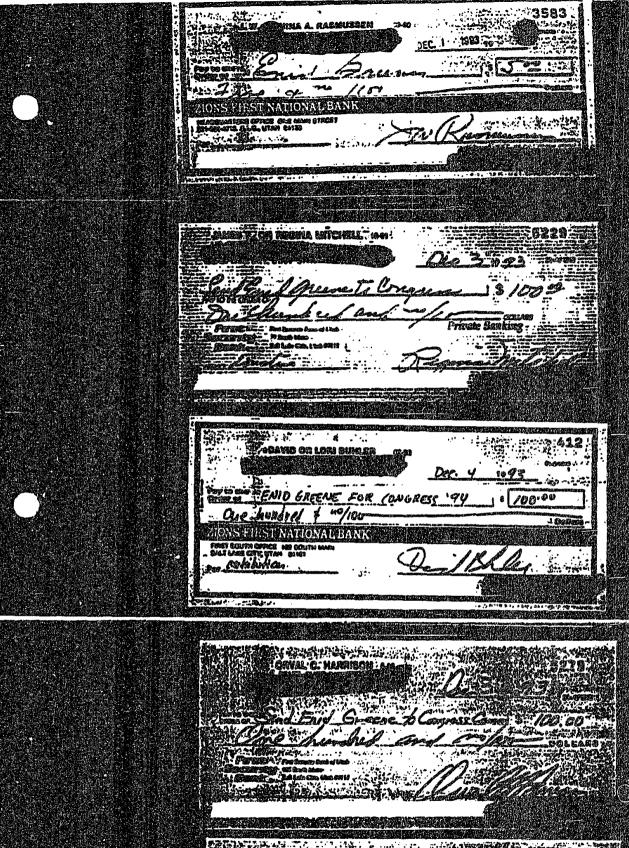


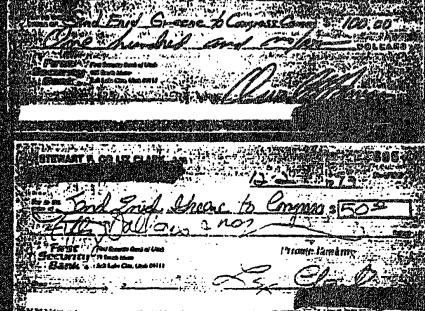


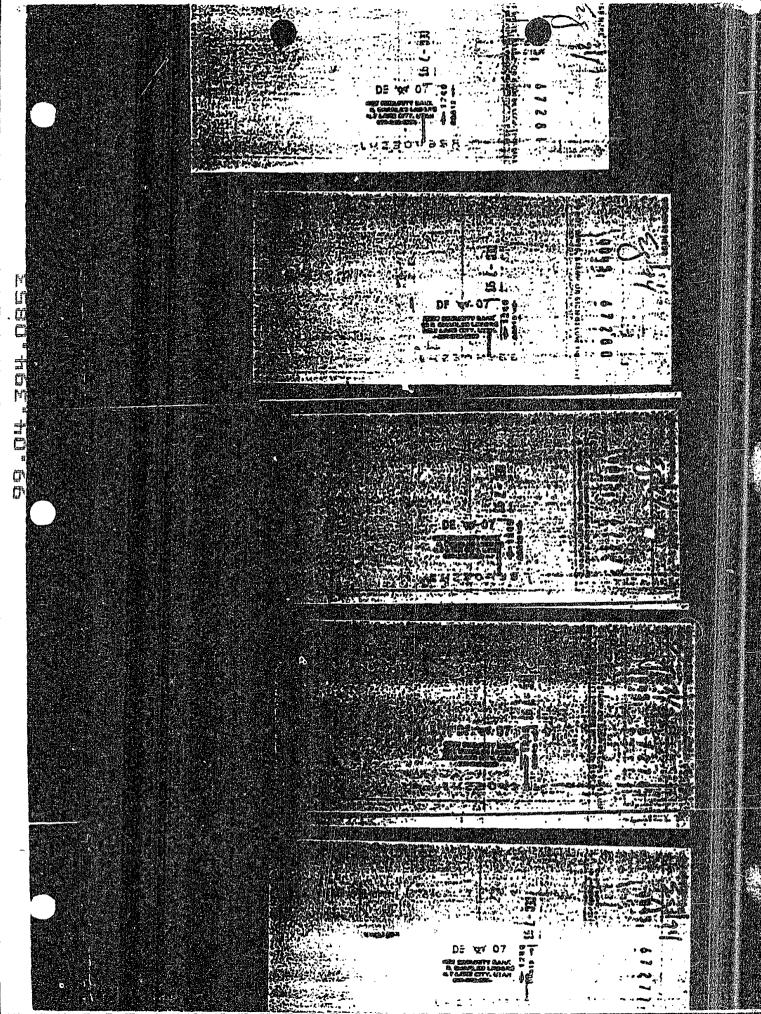


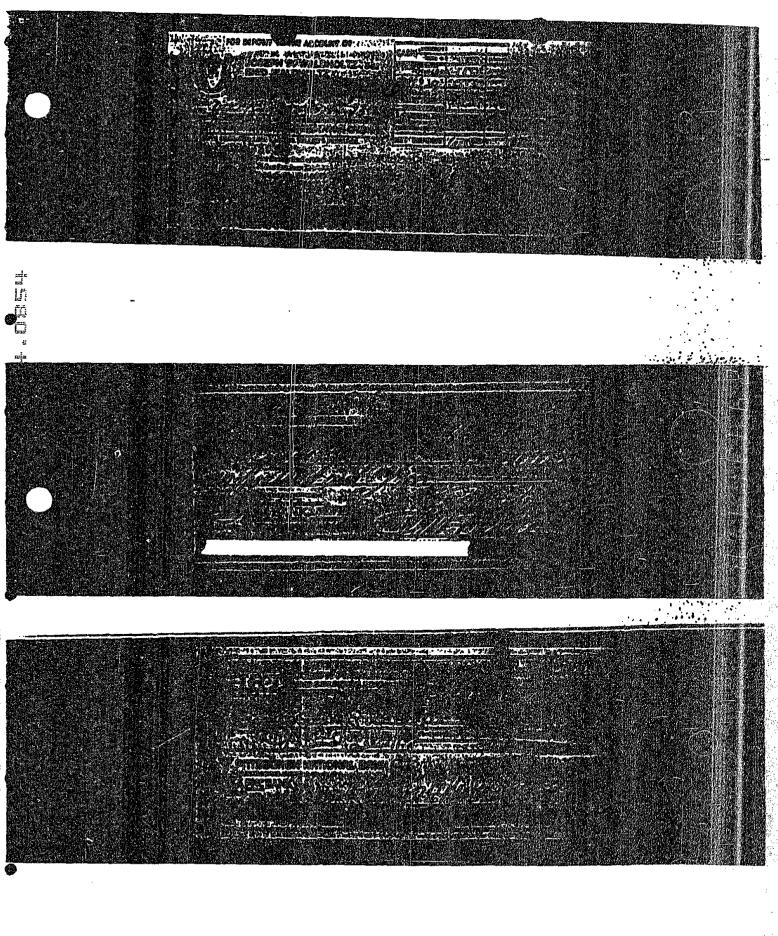


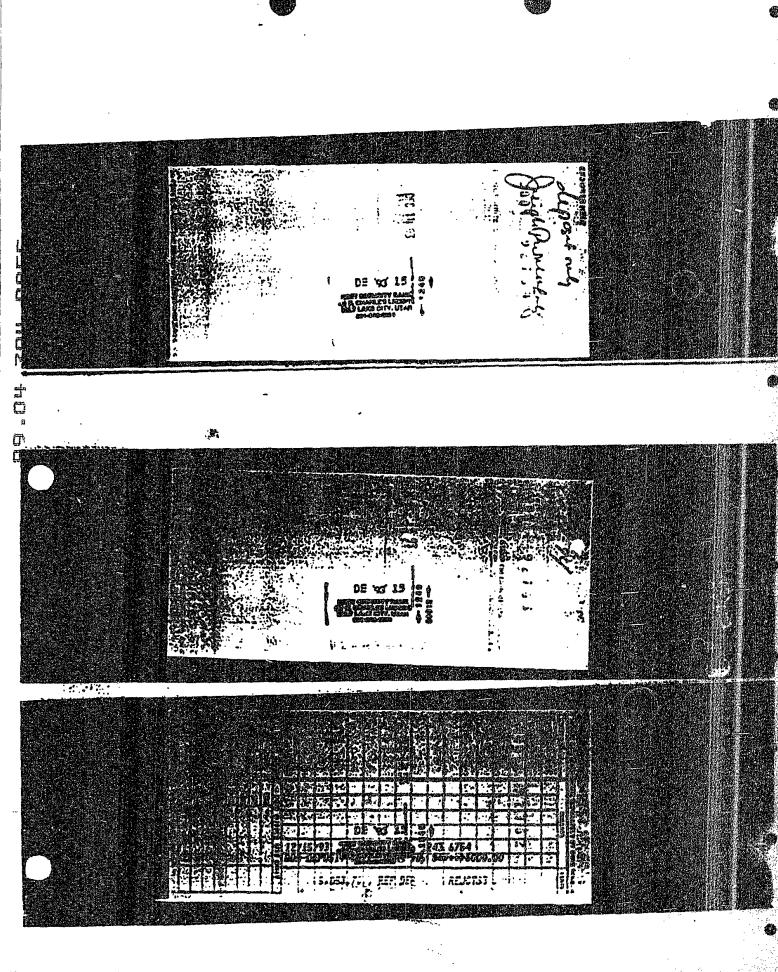












On Information and Belief, Commingling of Personal Funds and ENID '94 and ENID '96 Funds by Joseph Waldholtz in 1994 and 1995 Using Campaign and Counter Checks Made Payable to Cash

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